



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4052

DATE FILMED 3-7-95 CAMERA NO. 2

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

September 1, 1994

SEP 2 9 54 AM '94

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

MUR 4052

Re: FORMAL COMPLAINT REGARDING THE CAMPAIGN PRACTICES OF
ALAN WHEAT - MISSOURI SENATE CANDIDATE.

COMPLAINT

We, Gregory A. Gold, Andrew Buhr, Terry Sexton and Ben Brinker being full-time students attending the law and undergraduate schools of St. Louis University, hereby file this complaint with the Federal Election Commission pursuant to 2 U.S.C. sec. 437g. We adamantly object to individuals associated with the Senate Campaign of Alan Wheat blatant and offensive use of our school's facilities to promote his agenda which is in direct contrast to St. Louis University's mission and goals.

On or about August 26, 1994, individuals involved with the campaign of Alan Wheat acted in violation of the federal election laws. These individuals used a nonprofit corporation, St. Louis University, to distribute campaign brochures in violation of 2 U.S.C. sec. 441b. These individuals associated with Alan Wheat's campaign also directly violated the regulations promulgated by this Commission in 11 C.F.R. sec. 114.3. The individuals involved with Alan Wheat's campaign used this nonprofit corporation's mail and distribution facilities thereby receiving a gratuitous "contribution or expenditure" from a corporation "organized by authority of any law of Congress."

We, the below signed, respectfully urge the Commission to conduct a prompt and thorough investigation into the allegations of this complaint, and to declare the campaign of Alan Wheat violated the FECA and this Commission's regulations.

We hereby swear under oath that all the above information is true, to the best of my knowledge, by penalty of perjury on this First day of September 1994.

5043630893

SIGNATURES AND ADDRESSES

Gregory A. Gold

Gregory A. Gold
2352 A South 9th St.
St. Louis, MO 63104
(314) 865-0706

Andrew Buhr

Andrew Buhr
4535 Lindell #103
St. Louis, MO 63108
(314) 454-0587

Terry Sexton

Terry Sexton
3252 January
St. Louis, MO 63139
(314) 351-9397

Benjamin Brinker

Ben Brinker
3630 West Pine
St. Louis, MO 62108
(314) 977-4686

*Personally appeared before me
this 12 Day of Sept 1994.*

Richard R. Brandenburger

Exp 8/1/97



RICHARD R. BRANDENBURGER
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES AUG. 1, 1997

5043630394



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Gregory A. Gold
2352 A South 9th Street
St. Louis, MO 63104

RE: MUR 4052

Dear Mr. Gold:

This letter acknowledges receipt on September 2, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4052. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

5043630895



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Andrew Buhr
4535 Lindell #103
St. Louis, MO 63108

RE: MUR 4052

Dear Mr. Buhr:

This letter acknowledges receipt on September 2, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4052. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

5043630896



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Ben Brinker
3630 West Pine
St. Louis, MO 62108

RE: MUR 4052

Dear Mr. Brinker:

This letter acknowledges receipt on September 2, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4052. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

15043630897



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Terry Sexton
3252 January
St. Louis, MO 63139

RE: MUR 4052

Dear Mr. Sexton:

This letter acknowledges receipt on September 2, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4052. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

5043630898



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

Brian David Welch, Treasurer
Friends of Alan Wheat
8612 East 63rd Street
Kansas City, MO 64133

RE: MUR 4052

Dear Mr. Welch:

The Federal Election Commission received a complaint which indicates that Friends of Alan Wheat ("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 4052. Please refer to this number in all future correspondence.

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

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

15043630899

Brian David Welch, Treasurer
Friends of Alan Wheat
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

5043630900



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

The Honorable Alan Wheat
1295 West 72nd Terrace
Kansas City, MO 64114

RE: MUR 4052

Dear Mr. Wheat:

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 4052. 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.

15043630901

The Honorable Alan Wheat
Page 2

To ensure timely notification, a copy of this letter has been sent to you at your Washington, D.C. office.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

15043630202



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 9, 1994

The Honorable Alan Wheat
United States House of Representatives
2334 Rayburn House Office Building
Washington, D.C. 20515-2505

RE: MUR 4052

Dear Mr. Wheat:

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 4052. 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.

5043630903

The Honorable Alan Wheat
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

5043630904

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 26 12 54 PM '94

100 N. Broadway
Suite 1300
St. Louis, Missouri 63102
fax: 314-421-0239
314-421-4800

Husch & Eppenberger

ATTORNEYS AT LAW

September 22, 1994

Federal Election Commission
999 East Street, N.W.
Washington, D.C. 20463
Attn: Office of General Counsel

re: MUR #4052
Response Submitted on Behalf of
Wheat for Senate Committee

Gentlemen:

1. Initial Procedural Matters.

a. **Submission of Statement of Designation of Counsel.**
Attached hereto please find a duly executed Statement of Designation of Counsel, dated September 21, 1994, designating the undersigned as counsel to act on behalf of the Wheat for Senate Committee in the above matter.

b. **Timing of Response.** The FEC notification letter addressed to Congressman Alan Wheat, signed by Mary L. Taksar, Attorney, Central Enforcement Docket, was dated September 9, 1994, and was received on September 14, 1994. This response is being timely filed within 15 days of receipt of that notification letter.

c. **Confidentiality.** The Wheat for Senate Committee desires to keep this matter confidential, in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A).

2. Summary Conclusion.

No Action Should be Taken on the Basis of the Complaint, Because No Violation of the Federal Election Act Has Been Committed and No Contribution or Expenditure Has Been Made.

STL-289106

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Husch & Eppenberger

Federal Election Commission

Page 2

September 22, 1994

3. Discussion:

a. Analysis of Factual and Legal Allegations of Complaint.

The Complaint appears to make two related allegations: (1) that "individuals involved with the campaign" of the Wheat for Senate Campaign "used a nonprofit corporation, St. Louis University," to distribute campaign brochures in violation of 2 U.S.C. § 441b"; and (2) that "the individuals associated with" the Wheat for Senate Campaign "directly violated FEC regulations" in 11 C.F.R. § 114.3, by using St. Louis University's "mail and distribution facilities" and thereby receiving a "contribution or expenditure" from a corporation.

The one-page conclusory complaint is based on the skeletal factual allegation that individuals involved in the Wheat Campaign "used" St. Louis University "to distribute campaign brochures."

The Complaint does not include a copy of the alleged campaign brochure complained about. It provides no substantiation of any overt actions by the Wheat Campaign to "use" St. Louis University for any improper purpose. It provides no substantiation of any intent on the part of either the Wheat Campaign or St. Louis University to violate any FEC law or regulation.

b. Explanation of Factual Background.

Attached as Exhibit 1 hereto as an Affidavit from a Wheat for Senate Campaign staff member detailing the factual background of the matter. From the Affidavit the following facts emerge clearly (and are not rebutted by the skeletal factual allegations of the Complaint):

(i) the Wheat Campaign did not originate the idea of including a campaign flyer in packets distributed to St. Louis University freshmen;

(ii) there was never any intent either by the Wheat Campaign or by the St. Louis University administration to have the Wheat flyers constitute any type of endorsement or indication of support of the Wheat Campaign by St. Louis University; and

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Husch & Eppenberger

Federal Election Commission
Page 3
September 22, 1994

(iii) the Wheat Campaign staff member involved believed that the inclusion of the Wheat flyers was part of a broader effort by St. Louis University to provide political information to its freshmen, on a non-partisan basis.

c. Legal Discussion.

The minor incident complained of arose because a St. Louis University administrator attempted to accommodate a request by the Wheat for Senate Campaign to permit it access to freshmen during freshman orientation. Had St. Louis U. agreed to permit the Wheat campaign to have a table at the orientation, there would have been no problem (assuming that other party or campaigns would have been given equivalent permission). Similarly, had Congressman Wheat appeared on campus, his supporters could have distributed the flyer, and there would have been no problem.

Instead, the St. Louis U official offered to put a Wheat campaign flyer in the freshman orientation packets, along with other promotional information about student activities and commercial opportunities, such as coupons for discounted fast foods. From the standpoint of St. Louis U inclusion of a political flyer was no more an endorsement than inclusion of a pizza company discount offer.

And the Wheat campaign campus coordinator accepted the offer, after making certain that such conduct was considered appropriate by the St. Louis University officials involved.

The Wheat campaign campus coordinator had no idea that the Wheat flyer would be the only political flyer included in the freshman packet.

She did not remotely think that there might be any legal impropriety of such action by the Wheat campaign.

The action taken by St. Louis University was never intended to constitute an endorsement of the Wheat campaign or a "partisan communication" as used in 11 C.F.R. § 114.3. Not even the complainants in this case make such a contention. As stated in the newspaper articles, St. Louis U was merely informing its students about a major political campaign; it was not promoting a

Husch & Eppenberger

Federal Election Commission

Page 4

September 22, 1994

partisan position. Universities are in the business of ideas and exposing their students to responsible citizenship.

In retrospect, the school probably wishes that it had obtained similar campaign literature from the Ashcroft for Senate Campaign.

However it is interpreted, the action taken by St. Louis University does not constitute any improper conduct by the Wheat for Senate Campaign.

4. Conclusion.

This response clearly demonstrates that no action should be taken by the FEC against the Wheat Campaign based on the Complaint.

There was no violation of FEC law or regulation.

There was no contribution or expenditure made.

In essence, this Complaint constitutes a transparent attempt by a Senate opponent in a heated campaign to gain free media attention and to embarrass his opposition. It translates into a frivolous abuse of your agency's investigative responsibilities. This partisan effort should be dealt with as it deserves: it should be dismissed outright without further investigations needed.

We respectfully suggest that the Office of the General Counsel's initial report on the Complaint recommend that the Commission find no reason to believe that the Complaint sets forth a possible violation of the Act, and, accordingly, that the Commission close the file.

Please advise if you need any further information.

Sincerely yours,



John A. Rava

15043630908

Husch & Eppenberger

Federal Election Commission
Page 5
September 22, 1994

Enclosures:
Statement of Designation of Counsel
Affidavit of Marie-Therese Bigham
with Exhibits attached

15043630909

STATEMENT OF DESIGNATION OF COUNSEL

MUR #4052

NAME OF COUNSEL: John A. Rava
Husch & Eppenberger
ADDRESS: 100 N. Broadway, Suite 1300
St. Louis, MO 63102

TELEPHONE: (314) 421-4800

The above-named individual is hereby designated as ~~my~~ our
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on ~~my~~ ^{our} behalf before
the Commission.

WHEAT FOR SENATE COMMITTEE

September 20, 1994
Date

By 
Signature Julie Gibson
Campaign Manager

RESPONDENT'S NAME: Wheat for Senate Campaign
ADDRESS: 7711 Carondelet, Suite 403
St. Louis, MO 63105
(Attn: Ms. Julie Gibson, Campaign Manager)

HOME PHONE:

BUSINESS PHONE: (314) 863-1994

5043630910

AFFIDAVIT

I, MARIE-THERESE BIGHAM, being under oath, do hereby affirm as follows:

1. I reside at 4933 McPherson, Apt. B, City of St. Louis, Missouri. I am a senior at Washington University, in St. Louis, majoring in political science.

2. From June 1, 1994 through August 31, 1994, I was employed the St. Louis field staff of the Wheat for Senate Campaign Committee, based at its office at 6528 Manchester Road, St. Louis, Missouri. When the Washington University 1994-95 school year began, my position changed from a full-time paid staff person to a part-time unpaid intern.

3. One of my principal areas of responsibility was to coordinate Wheat campaign efforts at local area college and university campuses, including obtaining visibility and recruiting interns and volunteers from as many campuses as possible.

4. I called the administrations of various colleges and universities to attempt to receive permission to place tables at the orientation sessions or activities fairs held at the start of the school year.

5. When I called St. Louis University, I talked to Julie Saker, who was in charge of the St. Louis University orientation and activity fair. She said that as a non-campus based organization, the Wheat Campaign could not have its own table,

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but that the College Democrats could have such a table with Wheat literature.

6. Ms. Saker then suggested that the University could place a piece of campaign literature into the orientation packet to be given to all freshmen. I asked if she was certain that doing so was alright. She said it was proper.

7. I was told that if we delivered the materials to her office by a certain day, her staff would include a copy in each packet. I then delivered about 1,000 pieces of our one-page primary election day flyer (a copy is enclosed, marked as Exhibit A) to Ms. Saker's office. I had no further role in the matter.

8. I expected that the freshman packets would also include campaign flyers from the Ashcroft campaign and other political campaigns. It was never my intention or belief that St. Louis University would be endorsing or in any way supporting the Wheat campaign by enclosing a Wheat flyer to its freshmen. The effort was merely to inform the students of the existence of an important U.S. Senate race--for most of them their first opportunity to vote.

9. I have no first-hand knowledge of the motivation of the individuals who filed the complaint, or of the reasons for the actions taken by St. Louis University. However, from copies of articles from The University News, the St. Louis U student newspaper (copies attached as Exhibit B), it appears that one of the four complainants, Andrew Buhr, was a paid staff member of

the Ashcroft campaign, and that St. Louis University felt that its actions in the matter were proper.

I hereby swear under oath that the foregoing information is true, to the best of my knowledge, by penalty of perjury, this 21st day of September, 1994.

Marie-Therese Bigham
Marie-Therese Bigham

Sworn to before me this 21st day of September, 1994.

Jeffrey M. Kiennen
Notary Public

My commission expires JEFFREY M. KIENNEN, NOTARY PUBLIC
County of St. Louis, State of Missouri
My Commission Expires March 10, 1998

5043630913

Building a Better Future for Missouri



Alan Wheat

Democrat for
U.S. Senate



V O T E

15043630914

Alan Wheat

Building a Better Future

For Alan Wheat, government service is an opportunity to help build a better future for all Missourians.

Wheat served in the Missouri General Assembly and was named one of the "Ten Best Legislators in Missouri" by the *Jefferson City News-Tribune*.

In 1982, Wheat was elected to the U.S. House of Representatives and has built a strong record serving the people of Kansas City and suburban Jackson County.

P R I O R I T I E S

- Develop new jobs, expand employment and training programs
- Create educational opportunities for all Americans
- Enact welfare reform that emphasizes putting people to work
- Provide comprehensive health care for all Americans, including those with pre-existing medical conditions
- Pass anti-crime legislation providing hundreds of more police officers to Missouri communities

A C H I E V E M E N T S

- Sponsored the national Parents as Teachers program to assure children enter school "ready to learn"
- Brought new jobs to Missouri and fought job discrimination
- Fought for tougher trade policies to keep jobs in Missouri
- Sponsored legislation to raise the minimum wage
- Sponsored tough early "Three Strikes You're Out" sentencing legislation in 1984

VOTE

Alan Wheat U.S. Senate

For more information or a ride to the polls call:

Kansas City (816) 356-8830

St. Louis (314) 367-1555 or (314) 863-1994

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UNIVERSITY NEWS

A Student Voice Of Saint Louis University

Friday, September 9, 1994

12 Pages

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Campus Reaction

Should Alan Wheat fliers have been included in the freshmen packets?



"I think in hindsight it would have been better not to have been done... but certainly the University does not endorse privately or publicly any candidate."

— Lawrence Blondl, S.J.
University President



"I think it was inappropriate if not illegal... A complaint should have been filed against both [Wheat and the University]."

— Ken Warren
Political Science



"[SLU] should have contacted the opponent, but I saw nothing wrong with it. Any other politician had the same opportunity... the packet was not well read."

— Tom Lally
SGA President



"Freshmen can be exposed to a variety of social issues in their introduction to the University. So the placing of campaign literature in the packets per se does not violate any norms."

— Steven Puro
Political Science

SLU Students File Complaint Against Wheat Campaign

By MATTHEW HATHAWAY
OF THE UNIVERSITY NEWS

Four Saint Louis University students have filed a complaint to the Federal Election Commission regarding campaign literature inserted in orientation packets distributed by the Office of Student Life.

The students, Gregory Gold, Andrew Buhr, Terry Sexton and Ben Brinker, have directed their complaint against the Alan Wheat campaign. Wheat is a Kansas City congressman and Democratic Party nominee for the upcoming U.S. Senate race.

An orientation folder containing campaign literature provided by Friends of Alan Wheat was distributed on Thursday, Aug. 25.

According to a representative of the Federal Election Commission, this may be illegal since corporate facilities were used in a national campaign.

The formal complaint states: "Individuals used a nonprofit corporation, Saint Louis University, to distribute campaign brochures in violation of 2 U.S.C. Sec. 441b. These individuals associated with Alan Wheat's campaign also directly violated regulations promulgated by this

Commission in 11 C.F.R. Sec. 114.3."

However, SLU feels the law does not apply to this instance. "There was nothing illegal or unethical... [and] what we did was consistent with our policy of the past," said Dan Carey, SLU's vice president for student development.

Carey added that this policy would probably be changed due to recent outcry.

Representatives of the Wheat campaign agreed that packets violated no federal election laws.

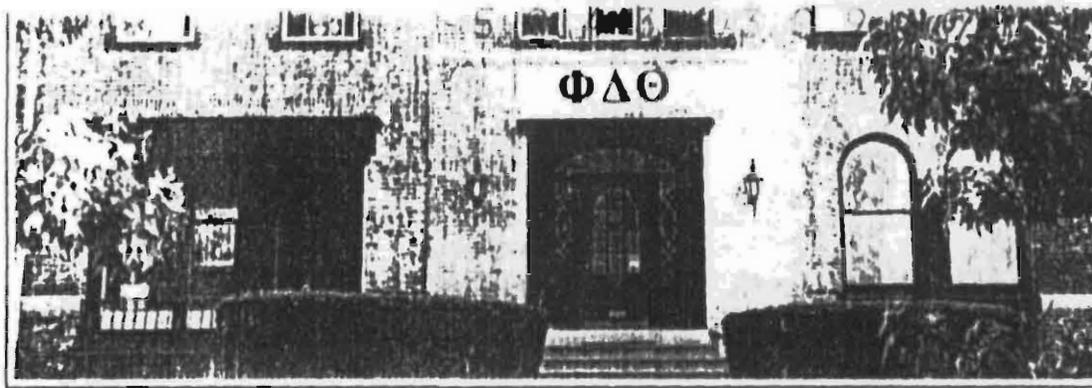
"We're not apologizing for actively seeking out young voters," said Alex Sachs, a press officer of the Wheat campaign.

"As Saint Louis University officials indicated, this is an opportunity that anyone would have been offered if they were to have asked, no matter what the partisan background was," Sachs said.

Sachs added that the packets contained commercial information from businesses that the University does not necessarily endorse.

See WHEAT, Page 9

EXHIBIT B



Benedikt Graf/The University News

The Phi Delta House, located on Lindell Boulevard, is the site of the alleged 'Rush' violation.

WHEAT

From page one

"This is not just an effort that was just a couple of students upset about a so-called violation," Sachs said. "It was something that had partisan motivation and part of this little attack squad John Ashcroft is operating."

Ashcroft is the Republican nominee. While none of the students who filed the complaint are active in SLU's College Republicans, Buhr works for the Ashcroft campaign.

"I think it was inappropriate if not illegal," said Kenneth Warren of the political science department. "But it's going to take a federal election attorney to figure out the legality."

"This could be considered an in-kind contribution, a contribution where [a corporation] volunteers services, facilities, etc."

Warren stressed that the packet represents a "soft" conflict of interest

between a nonpartisan University and a political campaign and gives the appearance that SLU endorses a candidate.

However, Warren feels that the complaint is filed against the wrong entity.

He said, "It may be wrong to do what the Wheat people did because a political campaign should be familiar with election law, but — on the other

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IT'S NEVER TOO EARLY

5 2 4 3 6 5 7 7 1 8

The University News Platform

"Freedom of expression and debate by means of a free and vigorous student press is essential to the effectiveness of an educational community in a democratic society.

"The student press must ensure the highest degree of accuracy and must not misrepresent the opinions or actions of individuals or groups.

"The paper cannot be expected to express the consensus of the readers whom it serves. If it can represent a point of view around which discussion may develop, it serves a legitimate and needed purpose."

From the Charter of The University News

Unjust Complaints

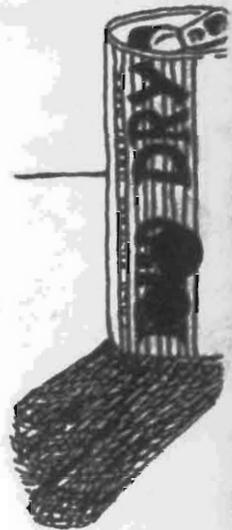
Recently, four SLU students have filed complaints to the Federal Election Commission against the Alan Wheat campaign.

The complaints revolve around the inclusion of some of Wheat's campaign literature in the freshman orientation packet. The complaints are legitimate. Unfortunately, they're also misdirected. True, campaign literature has no place in these packets, but at last check, political campaigns don't have final control over what is and what is not included in any student packets at SLU.

Simply put, the Wheat campaign was doing its job. They actively sought advertisement for their cause, and SLU's legal counsel approved. Council was called in because the University was the final determiner of the packet's contents. The University permitted the literature's inclusion, and it is the University that is ultimately responsible for the decision.

We oppose any complaint based purely on political motives.

DUDE! WHAT
THINKING? D
THAT, MAN...
AN ICE.



Letter

Political Protection

To The Editor:

Having read the headline article in the Aug. 26 edition of *The University News*, my first reaction was one of pleasure over the apparent attempt by student life to provide the incoming students with an element of political exposure. Young voters are all too often discounted by those who deem them uninformed or apathetic regarding political issues.

The fact of the matter is that young voters ought to be considered dispropor-

tioned in the theory and for the pursuits that we loathe. It is clear that the campaign nor the Life behaved malfeasance in this matter.

It is time to stop bickering and start The Wheat campaign the first political college students.

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

APR '95
SENSITIVE

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

I. INTRODUCTION

This report is the General Counsel's Monthly Report to recommend that the Commission no longer pursue the identified lower priority and stale cases under the Enforcement Priority System.

II. CASES RECOMMENDED FOR CLOSING

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

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 22 cases which do not warrant further pursuit relative to the other pending cases.¹ A short description of

1. These matters are: PM 305; MUR 3976; MUR 4023; MUR 4026; MUR 4031; MUR 4032; MUR 4036; MUR 4050; MUR 4051; MUR 4052; MUR 4055; MUR 4056; MUR 4058; MUR 4063; MUR 4068; MUR 4072; MUR 4073; MUR 4075; MUR 4078; MUR 4081; MUR 4082; and MUR 4083.

5043630921

RECEIVED
FEDERAL ELECTION
COMMISSION
SUBJECT

BEFORE THE FEDERAL ELECTION COMMISSION NOV '95

SENSITIVE

In the Matter of)

) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

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each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-22. For the Commission's convenience, the responses to the complaints for the externally-generated matters and the referral for the internally-generated matter are available in the Commission Secretary's office.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 9 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. However, for the Commission's convenience, the responses to the complaints for the externally-generated matters and the referrals for the internally-generated matters are also available in the

2. These matters are: MUR 3828; MUR 3829; RAD 93L-73; RAD 93L-75; RAD 93L-78; RAD 93L-83; RAD 93L-84; RAD 93L-88; and RAD 93L-91.

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Commission Secretary's office.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective February 21, 1995. By closing the cases effective February 21, 1995, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for these cases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective February 21, 1995 in the following matters:

- 1) RAD 93L-73
- 2) RAD 93L-75
- 3) RAD 93L-78
- 4) RAD 93L-83
- 5) RAD 93L-84
- 6) RAD 93L-88
- 7) RAD 93L-91

B. Decline to open a MUR, close the file effective February 21, 1995 and approve the appropriate letter in PM 305.

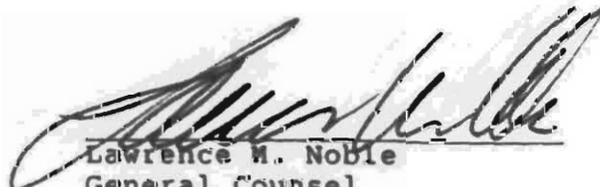
25043630921

C. Take no action, close the file effective February 21, 1995, and approve the appropriate letter in the following matters:

- 1) MUR 3828
- 2) MUR 3829
- 3) MUR 3976
- 4) MUR 4023
- 5) MUR 4026
- 6) MUR 4031
- 7) MUR 4032
- 8) MUR 4036
- 9) MUR 4050
- 10) MUR 4051
- 11) MUR 4052
- 12) MUR 4055
- 13) MUR 4056
- 14) MUR 4058
- 15) MUR 4063
- 16) MUR 4068
- 17) MUR 4072
- 18) MUR 4073
- 19) MUR 4075
- 20) MUR 4078
- 21) MUR 4081
- 22) MUR 4082
- 23) MUR 4083

25043630922
Date

2/13/95


Lawrence M. Noble
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enforcement Priority)

AMENDED CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that the Commission decided by a vote of 6-0 on February 16, 1995, to take the following actions with respect to the General Counsel's February 13, 1995 report on enforcement priority:

- A. Decline to open a MUR and close the file effective February 21, 1995 in the following matters:
- 1) RAD 93L-73
 - 2) RAD 93L-83
 - 3) RAD 93L-88
- B. Decline to open a MUR, close the file effective February 21, 1995 and approve the appropriate letter in PM 305.
- C. Take no action, close the file effective February 21, 1995, and approve the appropriate letter in the following matters:
- 1) MUR 3829
 - 2) MUR 4023
 - 3) MUR 4036

(continued)

5043630923

Federal Election Commission
Certification: Enforcement Priority
February 16, 1995

Page 2

- 4) MUR 4050
- 5) MUR 4051
- 6) MUR 4052
- 7) MUR 4055
- 8) MUR 4063
- 9) MUR 4072
- 10) MUR 4073
- 11) MUR 4075
- 12) MUR 4078
- 13) MUR 4081
- 14) MUR 4082
- 15) MUR 3976

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

Attest:

2-21-95
Date

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

5043630924



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Gregory A. Gold
2352 A South 9th Street
St. Louis, MO 63104

RE: MUR 4052

Dear Mr. Gold:

On September 2, 1994, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630925

MUR 4052

FRIENDS OF ALAN WHEAT

Four students from Saint Louis University filed a complaint alleging that the Friends of Alan Wheat Committee used the facilities of the University, a nonprofit corporation, to distribute campaign brochures resulting in a contribution or expenditure from a corporation.

In response to the complaint, the Wheat Committee states that it had sought permission to set up a table at freshman orientation but discovered that the University was unable to allow a non-campus based organization to set up a table at orientation. The Committee states that it was not the Committee's idea to include Wheat campaign flyers in a packet distributed to the freshmen but rather the option was offered by the orientation coordinator. The Committee indicates that the Wheat Committee staff member involved believed that the inclusion of the flyer in the packet was a broader effort by St. Louis University to provide political information to freshmen on a non-partisan basis and had no idea that it was the only political flyer that would be included in the packet. The Committee states that it was not the intent of the Committee or the University to have the Wheat flyers constitute any type of endorsement or support of Alan Wheat by St. Louis University.

This matter involves less significant issues relative to other issues pending before the Commission and there is no indication of any serious intent to violate FECA.

25043630926



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Alan Wheat
1295 West 72nd Terrace
Kansas City, MO 64114

RE: MUR 4052

Dear Mr. Wheat:

On September 9, 1994, 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 on February 21, 1995.

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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

15043630927

MUR 4052

FRIENDS OF ALAN WHEAT

Four students from Saint Louis University filed a complaint alleging that the Friends of Alan Wheat Committee used the facilities of the University, a nonprofit corporation, to distribute campaign brochures resulting in a contribution or expenditure from a corporation.

In response to the complaint, the Wheat Committee states that it had sought permission to set up a table at freshman orientation but discovered that the University was unable to allow a non-campus based organization to set up a table at orientation. The Committee states that it was not the Committee's idea to include Wheat campaign flyers in a packet distributed to the freshmen but rather the option was offered by the orientation coordinator. The Committee indicates that the Wheat Committee staff member involved believed that the inclusion of the flyer in the packet was a broader effort by St. Louis University to provide political information to freshmen on a non-partisan basis and had no idea that it was the only political flyer that would be included in the packet. The Committee states that it was not the intent of the Committee or the University to have the Wheat flyers constitute any type of endorsement or support of Alan Wheat by St. Louis University.

This matter involves less significant issues relative to other issues pending before the Commission and there is no indication of any serious intent to violate FECA.

25043630928



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

February 27, 1995

John A. Rava, Esq.
Busch & Eppenberger
100 N. Broadway, Suite 1300
St. Louis, MO 63102

RE: MUR 4052
Friends of Alan Wheat
Brian David Welch, Treasurer

Dear Mr. Rava:

On September 9, 1994, the Federal Election Commission notified your clients, Friends of Alan Wheat and Brian David Welch, 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 your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995.

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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630929

MUR 4052

FRIENDS OF ALAN WHEAT

Four students from Saint Louis University filed a complaint alleging that the Friends of Alan Wheat Committee used the facilities of the University, a nonprofit corporation, to distribute campaign brochures resulting in a contribution or expenditure from a corporation.

In response to the complaint, the Wheat Committee states that it had sought permission to set up a table at freshman orientation but discovered that the University was unable to allow a non-campus based organization to set up a table at orientation. The Committee states that it was not the Committee's idea to include Wheat campaign flyers in a packet distributed to the freshmen but rather the option was offered by the orientation coordinator. The Committee indicates that the Wheat Committee staff member involved believed that the inclusion of the flyer in the packet was a broader effort by St. Louis University to provide political information to freshmen on a non-partisan basis and had no idea that it was the only political flyer that would be included in the packet. The Committee states that it was not the intent of the Committee or the University to have the Wheat flyers constitute any type of endorsement or support of Alan Wheat by St. Louis University.

This matter involves less significant issues relative to other issues pending before the Commission and there is no indication of any serious intent to violate FECA.

25043630930



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Andrew Buhr
4535 Lindell #103
St. Louis, MO 63108

RE: MUR 4052

Dear Mr. Buhr:

On September 2, 1994, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630931

MUR 4052

FRIENDS OF ALAN WHEAT

Four students from Saint Louis University filed a complaint alleging that the Friends of Alan Wheat Committee used the facilities of the University, a nonprofit corporation, to distribute campaign brochures resulting in a contribution or expenditure from a corporation.

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25043630932



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Ben Brinker
3630 West Pine
St. Louis, MO 62108

RE: MUR 4052

Dear Mr. Brinker:

On September 2, 1994, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630233

MUR 4052

FRIENDS OF ALAN WHEAT

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This matter involves less significant issues relative to other issues pending before the Commission and there is no indication of any serious intent to violate FECA.

15043630934



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Terry Sexton
3252 January
St. Louis, MO 63139

RE: MUR 4052

Dear Mr. Sexton:

On September 2, 1994, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995. This matter will become part of the public record within 30 days.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630935

MUR 4052
FRIENDS OF ALAN WHEAT

Four students from Saint Louis University filed a complaint alleging that the Friends of Alan Wheat Committee used the facilities of the University, a nonprofit corporation, to distribute campaign brochures resulting in a contribution or expenditure from a corporation.

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This matter involves less significant issues relative to other issues pending before the Commission and there is no indication of any serious intent to violate FECA.

25043630936



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 4052

DATE FILMED 3-7-85 CAMERA NO. 2

CAMERAMAN JM#

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