



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 4198

DATE FILMED 10-9-96 CAMERA NO. 2

CAMERAMAN JmW

06043745123

WILLIAM S. OWEN
Suite 200
4809 Clinton Highway
Knoxville, TN 37912

MUR 4198

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

Re: Complaint of violations of
FEC rules by Calvin Moore
for Congress Committee, 4th
Congressional District, Tennessee

REC-20 2 15 PM '95

FEDERAL ELECTION
COMMISSION
OFFICE OF
GENERAL COUNSEL

I worked with the Calvin Moore for Congress campaign from its inception in May of 1993 until April 1994. The following narrative outlines some of the activities and tasks I performed. If additional documentation is desired it is available upon request.

During the months of April and May of 1993, I met repeatedly with State Representative Calvin Moore for the purpose of discussing his proposed candidacy for Tennessee's 4th Congressional District. At Rep. Moore's request, I developed an initial campaign strategy outline (see appendix 1) which would allow the campaign to begin the "testing the waters" phase. Rep. Moore agreed to my recommendations and authorized me to implement what I termed "The First Quarter," which was scheduled to begin June 1, 1993.

My responsibilities for the first month were to organize a "Meet and Greet" luncheon for June 15th at the National Democratic Club in Washington, D.C. (appendix 2) and to arrange a fundraiser for June 30th in Nashville, TN. (appendix 3). Both of these events were successfully completed and well attended.

The Nashville fundraiser, however, did not raise as much money as we had anticipated. The day after the fundraiser, Rep. Moore gave me a check for \$500 and asked to renegotiate our financial agreement. We then agreed that I would reduce my time commitment and reduce the agreed upon retainer from \$2,500 a month to \$1,000 a month. Furthermore, I agreed to defer \$1,500 of the June 1993 invoice until the election was over and to make the payment contingent upon Rep. Moore winning the election.

This amended agreement continued from July through November 1993. During that time I consulted with Rep. Moore on a regular basis. Specifically I arranged meetings for him with

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Democratic Party leaders in various counties throughout the 4th Congressional District. I printed up and distributed "Calvin Moore for Congress" press-on-lapel badges at the State Democratic Party Dinner honoring Vice President Al Gore (appendix 4). I did opposition research into the voting record of one of the leading primary opponents. Additionally, I made phone solicitations for campaign contributions.

In the third week of November, I attended the Calvin Moore for Congress campaign kickoff. I solicited contributions for the dinner and I contributed \$200. The day after the dinner Rep. Moore and I had a breakfast meeting to discuss campaign strategy, invoice arrears, and future campaign activities. Rep. Moore said that he wanted to terminate our retainer agreement and instead have an agreement based on a percentage of contributions. I agreed to Rep. Moore's request and agreed to continue providing strategic consulting with the stipulation that the overdue invoices would be paid out of funds I raised (appendix 5)

In December 1993, I delivered a check from AFSCME to Rep. Moore's legislative office in Nashville. In January, Rep. Moore paid me \$750 as per our November agreement.

In March, I requested and received a \$2,500 check from AFSCME for the Calvin Moore for Congress campaign. Subsequently, I billed Rep. Moore \$1,250 on March 31, 1994. Originally, Rep. Moore said he would mail me a check. It never arrived.

Then, I spoke with Rep. Moore by telephone and he asked me to come to Nashville and pick up a check. When I met with him, he said he did not have a check with him. He told me his wife would be in Nashville that night and he asked me to stay over in Nashville and said he would get a check from her the next day. When I met with him the next day, he said his wife did not come to Nashville, but he would call her and ask her to send a check. Later, I called Mrs. Moore and she said she would send a check to me in Knoxville. The check never arrived. The next week I called Mrs. Moore back to ask about the check and she said Calvin had told her not to send it.

I repeatedly called Rep. Moore at home and office during the end of April and the first of May, but he refused to return my calls.

Rep. Moore now claims that I did no work for him. Clearly, he is incorrect in this claim. The evidence I have presented and the payments Rep. Moore made to me document my several months of work with the Calvin Moore for Congress campaign. His statements to the contrary are simply an attempt to avoid paying a legitimate debt.

There are five specific areas the Calvin Moore for Congress campaign has violated FEC rules:

- 1) Payments were made to Bill Owen for consulting services performed but were not disclosed as required by FEC rules;

- 2) Invoiced debt balances for services rendered were not disclosed as required by FEC rules;
- 3) Invoices for services rendered were not paid as required by FEC rules;
- 4) Failure to pay invoices of over \$1,000 results in acceptance of an in-kind contribution in violation of FEC rules; and
- 5) In-kind contributions were not disclosed as required by FEC rules.

Additionally, my intention from the beginning of my involvement with the Calvin Moore for Congress campaign has been as a paid professional. The memorandum of May 17, 1993 and all subsequent invoices, letters and documents clearly reflect this. There has been no intent what-so-ever to provide in-kind contribution or contributions or activities in any way violation of FEC rules, regulations, or laws.

I, William S. Owen, hereby swear that the above styled complaint is true.

William S. Owen March 28, 1995
 William S. Owen Date

Signed and sworn before me this day of March 28, 1995
~~August 4, 1994~~.

Ann L. Halley 3/28/95
 Notary Public Date

My commission expires 3/31/98

11745126

ASSET & EQUITY CORPORATION

Suite 200
 4809 Clinton Hwy.
 Knoxville, TN 37912
 (615) 687-0429

To: Rep. Calvin Moore
 From: William S. Owen
 Asset and Equity Corp.
 Date: May 17, 1993
 Re: Democratic Primary Campaign Strategic Plan for election to
 Congress in 1994

First Quarter June 1, 1993 - Jan. 10, 1994
 Second Quarter Jan. 11, 1994 - June 1, 1994
 Third Quarter June 2, 1994 - July 23, 1994
 Fourth Quarter July 24, 1994 - August 4, 1994

The 1994 Democratic Primary Campaign for 4th District Congress may be thought of as a football game and divided into four quarters. The First Quarter begins, June 1, 1993, with the filing of the Calvin Moore for Congress Exploratory Committee and lasts until the start of next year's legislative session. A successful First Quarter will solidify support for The Calvin Moore Campaign, neutralize fence straddlers and demoralize the opposition.

Goal One should be to score at least one Touchdown in each county in the First Quarter. This will be done by organizing fundraising events in each of the District's 22 counties for the purpose of realizing at least \$2000.00 per county. These fund-raisers will demonstrate organizational strength in each county. Additionally, they will provide funds for on-going activities such as travel, postage, printing, correspondence, local ads, etc. Furthermore, they will minimize opposition efforts in each county.

Goal Two should be to host a Nashville Fund-raiser the end of June in order to raise seed money for the implementation of Goal One. I suggest June 30, because it is prior to the 4th of July holiday weekend and most people will still be in town. I anticipate raising at least \$15,000 at this fund-raiser and probably \$25,000 plus. This needs to be done for the following reasons:

- 1) The money is needed to start campaigning.
- 2) The funds generated will show if you are a viable candidate.
- 3) FEC regulations prohibit spending state campaign funds for federal races.

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- 4) Early contributors like to feel they are backing the ultimate winner.
- 5) Early contributions dampen the likelihood of other potential candidates.
- 6) Next year the competition for money will be fierce. Get it now and start campaigning.

Goal Three in the First Quarter is to outclass any potential opposition. By utilizing the contacts through colleagues in the legislature and by raising and spending a relatively small amount of money, approximately \$50,000 - \$60,000, Rep. Calvin Moore will easily be seen as the 4th District's next congressman. This activity will motivate additional contributions to the Moore Campaign and will evaporate potential contributions to the other candidates. A blow-out in the First Quarter will result in some potential candidates quitting and not even showing up for the Second, Third, and Fourth Quarters.

Date to Remember:

Oct. 23, 1993

County organizational meetings for Democratic Party

Plan to visit Hamblen, Campbell, Cumberland, Warren, Coffee, Franklin and Giles Counties. I have a plane arranged.

Memos on 2nd, 3rd, and 4th Quarters to follow.

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Calvin Moore for Congress Exploratory Committee

First Quarter Budget
June 1 - Dec. 31, 1993

Weekly Expenses

Headquarters Rent (Coffee County)	\$ 75.00
Secretarial/Clerical	200.00
Phone	50.00
Computer/FAX	50.00
Postage	50.00
Travel	125.00
Administrative	625.00*
Miscellaneous	<u>100.00</u>
TOTAL	<u>\$1,500.00</u>

Sources

22 counties x \$2000.00	\$44,000.00
Trial Lawyers	2,000.00
AFSCME	2,000.00
Chiropractors	2,000.00
NRA	2,000.00
Teamsters	2,000.00
Malt Beverage Assoc.	2,000.00
Miscellaneous	<u>6,000.00</u>
TOTAL	<u>\$62,000.00</u>

*Includes office (Knox County), clerical assistance,
telephone/FAX, etc.

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4TH DISTRICT COUNTIES

1. Hamblen
2. Claiborne
3. Grainger
4. Knox
5. Union
6. Campbell
7. Scott
8. Pickett
9. Fentress
10. Cumberland
11. Rhea
12. White
13. Warren
14. Coffee
15. Moore
16. Bedford
17. Franklin
18. Lincoln
19. Criles
20. Lawrence
21. Wayne
22. Hardin

9604375130

Demo. Officeholders

Office	Name

Demo. Executive Committeeman

Name	Phone
Address	Zip Code

Demo. Executive Committeewoman

Name	Phone
Address	Zip Code

1992 Presidential Vote
March Primary Total: _____
Nov. General: Clinton
Bush
Perot

1992 Congressional Vote
Nov. General: Cooper
Johnson

1992 Demo. Primary Total: _____

9504375131

ASSET & EQUITY CORPORATION

Suite 200
4809 Clinton Hwy.
Knoxville, TN 37912
(615) 687-0429

May 24, 1993

Mr. Richard Crawford
Suite 1214
2100 Kay St.
Washington D.C. 20015

Dear Mr. Crawford:

As you know, Tennessee Congressman, Jim Cooper, is running for the U.S. Senate seat vacated by Vice-President Al Gore. Consequently, State Representative Calvin Moore (D-Lawrence County) is anticipating running for U.S. Congress from Tennessee's 4th Congressional District.

Rep. Moore has formed an exploratory committee for the purpose of ascertaining his support. He has received strong encouragement in each of the 4th District's 22 counties.

Calvin is an eight year veteran legislator and proven vote-getter who has served his district well in Nashville. However, he is not familiar with the Washington environment. Therefore, in order to introduce Rep. Moore to individuals in Washington who are interested in matters affecting Tennessee, we invite you to join us for a buffet lunch at 12:00 noon, Tuesday, June 15, 1993, at the National Democratic Club.

We look forward to seeing you, June 15.

Sincerely,

Bob Cashdollar
President
Cashdollar-Jones, Inc.

William S. Owen
President
Asset & Equity Corporation

P.S. THIS IS NOT A FUND-RAISER. WE'LL EVEN BUY LUNCH!

R.S.V.P. (202)728-4058

26043745132

RECIPIENTS OF THE MOORE LETTER 5/28/93

06043745133

Individual

Telephone

RSVP

✓ Roy Palk
National Rural Electric Co-op Association
1800 Massachusetts Avenue, NW
Washington, DC 20036

202/857-9500

Claiborn Crain *+ Dawn Riley*
Burley and Dark Leaf Tobacco Growers Assn.
1100 17th Street, NW
Suite 505
Washington, DC 20036

202/296-6820

Yes

Dick Crawford
Lipson, Whitten & Diamond
1725 DeSales Street, NW
8th Floor
Washington, DC 20036

202/659-6540

Paul Equale
Independent Insurance Agents of America
600 Pennsylvania Avenue, SE
Suite 200
Washington, DC 20003

202/544-5833

Neal P. Gillen
American Cotton Shippers Association
1725 K Street, NW
Suite 1210
Washington, DC 20006

202/296-7116

No

Bill Hecht
Bill Hecht & Associates
499 South Capitol Street, SW
Suite 501
Washington, DC 20003

202/554-2881

✓ Jim Johnson
U.S. Beet Sugar Association
1115 15th Street, NW
Suite 1019
Washington, DC 20005

202/296-4820

yes

Tommy J. Payne
RJR Nabisco
1455 Pennsylvania Avenue, NW
Suite 525
Washington, DC 20004

202/626-7220

Yes

*1725 DeSales St. NW
Suite 505
Washington, DC 20036*

202/313-4760

Individual

Telephone

RSVP

Tom Little
Dairymen Incorporated
1000 Thomas Jefferson, NW
Suite 600
Washington, DC 20007

202/965-6565

Amy Millman
Phillip Morris, Inc.
1341 G Street, NW
9th Floor
Washington, DC 20005

202/637-1500

Norman Sharp
Cigar Association of America
1100 17th Street, NW
Suite 504
Washington, DC 20036

202/223-8204

Dagmar Farr
Food Marketing Institute
1750 K Street, NW
Washington, DC 20006

202/452-8444

Yes

Anthony Haynes
National Association of Conservation Districts
509 Capitol Ct., NE
Washington, DC 20002

202/547-6223

Yes

Ray Lancaster
Texas Gas Transmission Corporation
555 13th Street, NW
Suite 430 West
Washington, DC 20004

202/393-8577

Dick White
Tobacco Institute, Inc.
1875 Eye Street
Suite 800
Washington, DC 20006

202/457-9336
202/457-4880

yes

Don Wallace
Wallace & Edwards
1150 Connecticut Avenue, NW
Suite 507
Washington, DC 20036

202/331-4331

Tom Buis
Blaemire Communications
1807 Michael Faraday Court
Reston, VA 22090-5344

703/742-3466

yes

50474514

Individual

Telephone

RSVP

Thomas A. Davis
David & Harman
1455 Pennsylvania Avenue, NW
Suite 1200
Washington, DC 20004

202/347-2230

Sally White
Winston & Strawn
1400 L Street, NW
Washington, DC 20005

202/371-5700

yes

George Tagg
Federal Express Company
300 Maryland Avenue, NE
Washington, DC 20002

202/546-1631

Dick Lodge
Bass, Berry & Sims
First American Center
26th Floor
Nashville, TN 37238

615/

No

Anna Windrow
Bass, Berry & Sims
First American Center
26th Floor
Nashville, TN 37238

615/

No

Wallace Clemons
Director, D.R.I.V.E. Dept.
Teamsters Union Int'l.
25 Louisiana Avenue, NW
Washington, DC 20001

202/624-6834

No

~~Frank Cowan~~ Linda Canon
~~Assistant to the President~~ Research Analyst
AFSCME Int'l.
1625 L Street, NW
Washington, DC 20036

202/429-5067

yes

Jim Neeley
AFL-CIO
1901 Lindel Street
Nashville, TN 37203

615/

Eddie Bryant
AFL-CIO
1901 Lindell Street
Nashville, TN 37203

615/

5
3
5
1
4
7
3
4
3
0
6

Individual

Telephone

RSVP

Rep. Calvin Moore
P.O. Box 175
West Point, TN 38486

(OR)

Suite 20
Legislative Plaza
Nashville, TN 37243

Yes

Lamont Carter
Tennessee Chiropractic Assn.
611 Commerce Street
Suite 3012
Nashville, TN 37203

No

615/

Rick Miller
Vice President of Government Relations
American Chiropractic Association
1701 Clarendon Blvd.
Arlington, VA 22209

703/276-8800

Mike Hogan
Assistant to Government Relations
American Chiropractic Association
1701 Clarendon Blvd.
Arlington, VA 22209

703/276-8800

Gayla Kirksey
Manufacturers Housing Institute
1745 Jefferson Davis Highway
Suite 511
Arlington, VA 22202

703/413-6620

Yes

Laura McPherson ✓

Yes

list as of 6/9/93

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(40)

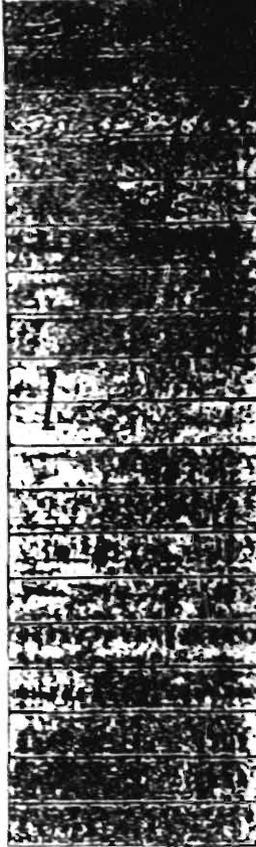
200699

TYPE OF FUNCTION: Lunch NUMBER OF GUESTS: 20
 DATE: June 15, Tues TIME: 12-2 ROOM: Rm 2
 CONTACT NAME: Bill Owen PHONE: (615) 637-0489
 CLIENT NAME: Assets & Equity Corp ACCOUNT NUMBER:
 ADDRESS: 4809 Clinton Highway # 200 Knoxville, TN 37912
 SPONSORS NAME: ACCOUNT NUMBER: CONFIRMATION:

SERVING TIME 12:00 pm

6/15/03 9:11 20 BQT 118955
 DATE SERVER COVERS TABLE

16.95pp



Lunch for Rep Moore
 @ 16.95 339.00
 Grat 50.85
 Tax 30.51
 Labor 35.00
455.36

(single)
 chicken breast
 3 peppers
 sweet
 potatoes

PIANO DANCE FLOOR

RAIL CALL

TRAFFIC NO BAR



Buffet

OD 339.00
 D GRAT. 50.85
 GRAT.
) TAX 30.51
 TAX
 OR 35.00
 I CHARGE
 R FLOOR

MEMBER CHARGE []

ADDITIONAL CHGS.
 TOTAL 455.36 455.36
 DEPOSIT
 BALANCE 455.36 455.36

96043745167

CASHDOLLAR-JONES & COMPANY
A GOVERNMENT RELATIONS FIRM

Ed Jones, Chairman
Box 198
Mem. TN 38389
TEL: (901) 643-6400 FAX: (901) 643-6222

Robert Cashdollar, President
1000 Connecticut Street, N.W., Suite
Washington, D.C. 20036
TEL: (202) 738-4088 FAX: (202) 4

OUR FAX: (202) 466-5283

Date:

27 May 93

TO: NAME:

Bill Owen

FAX :

615 588-0626

From:

Bob Cashdollar

Number of Pages (including this sheet): 3

Comments:

Bill -

Tim Free decided to be cautious
and not sign the letter. He said
he would come to lunch.

Here is the final version and
my list

Bob

03043745138

CASHDOLLAR-JONES & COMPANY

A GOVERNMENT RELATIONS FIRM

Ed Jones, Chairman
P.O. Box 128
Yorkville, TN 38388
TEL (901) 643-8400 FAX (901) 643-6222

Robert Cashdollar, President
1000 Sixteenth Street, N.W., Suite 702
Washington, D.C. 20036
TEL: (202) 728-4058 FAX: (202) 466-5283

May 27, 1993

Roy Palk
National Rural Electric Co-Op Association
1800 Massachusetts Avenue, NW
Washington, DC 20036

Dear Roy:

As you know, Tennessee Congressman Jim Cooper is running for the U.S. Senate seat that was vacated by Vice President Al Gore. Consequently, State Representative Calvin Moore (D-Lawrence County) is anticipating running for Congress as the representative from Tennessee's 4th Congressional District.

Representative Moore has formed an exploratory committee for the purpose of ascertaining the strength of his grassroots support. We are pleased to report that he has received strong encouragement in each of the 4th District's 22 counties.

Calvin Moore is an eight-year veteran legislator and proven vote-getter who has served his district well in Nashville. However, he is unfamiliar with the Washington environment. Therefore, in order to introduce Representative Moore to those individuals in Washington who are interested in Tennessee-related issues, we invite you to join us for a buffet lunch at 12:00 noon, Tuesday, June 15, 1993 at the National Democratic Club, 30 Ivy Street, SE, Washington, DC.

We look forward to seeing you on June 15th.

Sincerely,

Robert Cashdollar
President
Cashdollar-Jones & Company

William S. Owen
President
Asset & Equity Corporation

P.S. THIS IS NOT A FUNDRAISER. WE'LL EVEN BUY LUNCH!

RSVP - Kathy McGuigan (202) 728-4058

23047745139

1 Electric Co-op Association
Setts Avenue, NW
C 20036

202/857-9500

n
Burley and Dark Leaf Tobacco Growers Assn.
1100 17th Street, NW
Suite 505
Washington, DC 20036

202/296-6820

Dick Crawford
Lipson, Whitten & Diamond
1725 DeSales Street, NW
8th Floor
Washington, DC 20036

202/659-6540

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Independent Insurance Agents of America
600 Pennsylvania Avenue, SE
Suite 200
Washington, DC 20003

202/544-5833

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1725 K Street, NW
Suite 1210
Washington, DC 20006

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499 South Capitol Street, SW
Suite 501
Washington, DC 20003

202/554-2881

Jim Johnson
U.S. Beet Sugar Association
1115 15th Street, NW
Suite 1019
Washington, DC 20005

202/296-4820

Tommy J. Payne
RJR Nabisco
1455 Pennsylvania Avenue, NW
Suite 525
Washington, DC 20004

202/626-7220

Tom Little
Dairymen Incorporated
1000 Thomas Jefferson, NW
Suite 600
Washington, DC 20007

202/965-6565

74510

Amy Hillman
Phillip Morris, Inc.
1341 G Street, NW
9th Floor
Washington, DC 20005 202/637-1500

Norman Sharp
Cigar Association of America
1100 17th Street, NW
Suite 504
Washington, DC 20036 202/223-8204

Dagnar Farr
Food Marketing Institute
1750 K Street, NW
Washington, DC 20006 202/452-8444

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National Association of Conservation Districts
509 Capitol Ct., NE
Washington, DC 20002 202/547-6223

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555 13th Street, NW
Suite 430 West
Washington, DC 20004 202/393-8577

Dick White
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1875 Eye Street
Suite 800
Washington, DC 20006 202/457-9336
202/457-4880

Don Wallace
Wallace & Edwards
1150 Connecticut Avenue, NW
Suite 507
Washington, DC 20036 202/331-4331

Tom Buis
Blaemire Communications
1807 Michael Faraday Court
Reston, VA 22090-5344 703/742-3466

Thomas A. Davis
David & Harman
1455 Pennsylvania Avenue, NW
Suite 1200
Washington, DC 20004 202/347-2230

3043745141

Sally White
Winston & Strawn
1400 L Street, NW
Washington, DC 20005

202/371-5700

George Tagg
Federal Express Company
300 Maryland Avenue, NE
Washington, DC 20002

202/546-1631

06043745142

Rep. Calvin
MOORE
'94 Congress

26043745143



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1995

William S. Owen
4809 Clinton Highway, Suite 200
Knoxville, TN 37912

RE: MUR 4198

Dear Mr. Owen:

This letter acknowledges receipt on March 28, 1995, 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 4198. 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

504 / 45134



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1995

Eddie Davidson, Treasurer
Calvin Moore for Congress
2059 Tennessee Street
West Point, TN 38486

RE: MUR 4198

Dear Mr. Davidson:

The Federal Election Commission received a complaint which indicates that Calvin Moore for Congress ("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 4198. 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.

043745145

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

cc: Calvin Mitchell Moore

5010745146

D O N E L S O N

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

(Appendix 3)

2615 Lebanon Rd. • Nashville, TN 37214
(615) 889-1400 • Fax: (615) 889-3164

INVOICE

JUN 29 3 44 PM '95



SENSITIVE

DATE: 29 Jun 93 INVOICE # 1574

(MIR 4198)

BILL TO
CALVIN MOORE

6/29/95

ITEMS ORDER TERMS PROJECT

C.O.D. Appendix

	QUANTITY	DESCRIPTION	RATE	AMOUNT
	1,000	3 PIECE INVITATIONS	0.25	250.00
		SALES TAX	8.25 %	20.63

TOTAL

270.63

DEFERRED PAY

270.63

6043745147

STATEMENT

Arlington Press

0-4855

3551 North Broadway • P.O. Box 3423 • Knoxville, TN 37917
(615) 689-7446

Date 8-1-93

(Appendix 4)

SOLD TO:

BILL OWEN

ADDRESS

ATTENTION

Bill

TERMS NET-PLEASE PAY ON INVOICE

DATE & TIME OF ORDER DATE AND TIME REQUIRED CUSTOMER P.O. NUMBER

8-1-93

QUAN	PAGES	SHEETS	BOOKS	DATE	WILL CALL	DELIVER	CASH	CREDIT
			1 2	X				

PRINTING

1,000 - STICKERS

TYPESET - ART - FILM

1-COLOR

INK

"CALVIN MOORE"

PAPER

BINDING STYLE

LAPEL STICKERS

OTHER

TOTAL SALE \$ 100.00

TAX 7.75

TOTAL \$ 107.75

RECEIVED BY

DATE

PAYMENT RECEIVED

TERMS NET 30 DAYS INTEREST WILL BE CHARGED

The undersigned have proofed all material, type changes, and prices related to this order and found all to meet my approval.

SIGNATURE

96046745148

(Appendix 4)

WILLIAM S. OWEN
Apt. 62, 100 Brentwood Circle
Knoxville, Tennessee 37909
615-588-0626

NOV 26 1993

November 26, 1993

Mr. Calvin Moore
20 Legislative Plaza
Nashville, TN 37219

Dear Calvin:

Congratulations on a successful fund raiser and campaign kickoff. The crowd was most impressive and supportive.

During the past five (5) months, I have enjoyed the opportunity to work with you extensively. However, I understand your desire to modify our previous agreement.

This letter will serve to reduce to writing the items we discussed at breakfast the day after your fund raiser.

1. Effective December 1, 1993, we will suspend paid consultation services.
2. Unpaid balances for work previously done will be deferred and will be paid out of funds I raise for the campaign.
3. Deferred balances will be paid at the following rates:
 1. 50% of any contribution raised from AFSCME until balance is paid.
 2. A percentage to be determined of any other funds raised.
 4. I will continue to be involved in the planning stages of campaign.

Enclosed please find a copy of my most recent invoice. I look forward to our continued work together.

Sincerely yours,



William S. Owen

WSO/mb
Enclosure

043745189

1105 2100

INVOICE

To: Calvin Moore, Representative

From: William S. Owen, Asset and Equity Corp.

Date: November 1, 1993

June Invoice

Billed

\$1,000.00

Amount received (Thank you)

\$ 500.00

Balance

\$ 500.00

Deferred billing
contingent on
winning

\$1,500.00

July Invoice

Billed

\$1,000.00

Amount Received (Thank you)

500.00

August Invoice

Billed

1000.00

September Invoice

Billed

1000.00

October Invoice

Billed

1000.00

November Invoice

Billed

1000.00

Total Due

\$5000.00

Bill is due upon receipt. Late charges are billed at 1.8% per month. Collection attempts requiring collection agencies or other legal costs are the responsibility of the client.

06043 / 45100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1995

William S. Owen
4809 Clinton Highway, Suite 200
Knoxville, TN 37912

RE: MUR 4198

Dear Mr. Owen:

This letter acknowledges receipt on April 4, 1995, of the supplement to the complaint you filed on March 28, 1995. The respondent(s) will be sent copies of the supplement. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

1513743406



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1995

Eddie Davidson, Treasurer
Calvin Moore for Congress
2059 Tennessee Street
West Point, TN 38486

RE: MUR 4198

Dear Mr. Davidson:

On April 3, 1995, you were notified that the Federal Election Commission received a complaint from William S. Owen alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification. The Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure

cc: Calvin Mitchell Moore

26043745152

BEFORE THE FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

AUG 14 4 50 PM '96

In the Matter of

)
)
)

Enforcement Priority

SENSITIVE

GENERAL COUNSEL'S REPORT

I. INTRODUCTION

In accordance with the objectives of the Enforcement Priority System ("EPS") adopted by the Commission in May 1993, the Office of the General Counsel has periodically recommended that the Commission not pursue cases that are stale or that, in comparison to other pending matters, do not appear to warrant the use of the Commission's limited resources. This General Counsel's Report recommends the Commission not pursue 43 cases that fall within these categories.

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 Commission 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

96043745153

Because our recommendation not to pursue these cases is based on their staleness, this Office has not prepared separate narratives for these cases. we have attached responses and referral materials in those instances where the information was not previously circulated. Attachments 26-45.

This Office recommends the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective September 3, 1996. By closing the cases effective that day, CED and the Legal Review Team each will have the necessary time to prepare closing letters and case files for the public record.

9 6 0 4 3 7 4 5 1 5 5

III. RECOMMENDATIONS

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NF-2!

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in the following matters:

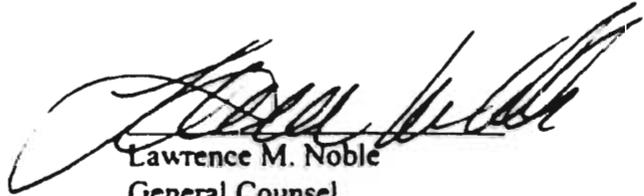
- 1) MUR 4061
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198
- 10) MUR 4201
- 11) MUR 4227
- 12) MUR 4232
- 13) MUR 4273
- 14) MUR 4290
- 15) MUR 4292
- 16) MUR 4293
- 17) MUR 4294
- 18) MUR 4299
- 19) MUR 4312
- 20) MUR 4316
- 21) MUR 4318
- 22) MUR 4324
- 23) MUR 4325
- 24) MUR 4329
- 25) MUR 4330
- 26) MUR 4333
- 27) MUR 4334

604 / 45156

- 28) MUR 4336
- 29) MUR 4339
- 30) MUR 4348
- 31) MUR 4359
- 32) MUR 4360
- 33) MUR 4363
- 34) MUR 4364

C. Take no further action, close the file effective September 3, 1996, and approve the appropriate letters in MUR 3826.

8/14/96
Date _____


Lawrence M. Noble
General Counsel

6043745157

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enforcement Priority.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 21, 1996, the Commission took the following actions on the General Counsel's August 14, 1996 report on the above-captioned matter:

1. Decided by a vote of 5-0:

A. Decline to open a MUR, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) Pre-MUR 293
- 2) Pre-MUR 311
- 3) Pre-MUR 328
- 4) RAD Referral 95L-03
- 5) RAD Referral 95L-11
- 6) RAD Referral 95L-16
- 7) RAD Referral 95L-22
- 8) RAD Referral 95NF-21

B. Take no action, close the file effective September 3, 1996, and approve the appropriate letters in each of the following matters:

- 1) MUR 4061
- 2) MUR 4074
- 3) MUR 4101
- 4) MUR 4146
- 5) MUR 4151
- 6) MUR 4175
- 7) MUR 4180
- 8) MUR 4184
- 9) MUR 4198

(continued)

9 6 0 4 3 7 4 5 1 5 8

Federal Election Commission
Certification for Enforcement
Priority
August 23, 1996

Page 2

- 10) MUR 4227
- 11) MUR 4232
- 12) MUR 4273
- 13) MUR 4290
- 14) MUR 4292
- 15) MUR 4293
- 16) MUR 4294
- 17) MUR 4299
- 18) MUR 4312
- 19) MUR 4316
- 20) MUR 4318
- 21) MUR 4324
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- 27) MUR 4336
- 28) MUR 4339
- 29) MUR 4348
- 30) MUR 4359
- 31) MUR 4360
- 32) MUR 4363
- 33) MUR 4364

Commissioners Aikens, Elliott, McDonald,
McGarry, and Thomas voted affirmatively with
respect to each of the above-noted matters.

Attest:

8-26-96
Date

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

Received in the Secretariat: Wed., Aug. 14, 1996 4:56 p.m.
Circulated to the Commission: Fri., Aug. 16, 1996 12:00 p.m.
Deadline for vote: Wed., Aug. 21, 1996 4:00 p.m.

bjr

96043745159



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 06 1996

William S. Owen
4809 Clinton Highway, Suite 200
Knoxville, TN 37912

RE: MUR 4198

Dear Mr. Owen:

On April 3, 1995, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on September 3, 1996. 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. § 437(g)(2)(A)(8)

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

6043745130



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 06 1996

Eddie Davidson, Treasurer
Calvin Moore for Congress
2059 Tennessee Street
West Point, TN 38486

RE: MUR 4198

Dear Mr. Davidson

On April 3, 1995, 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 exercised its prosecutorial discretion to take no action against Calvin Moore for Congress and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on September 3, 1996.

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,

Colleen T. Sealander, Attorney
Central Enforcement Docket

96046745161



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4198

DATE FILMED 10-9-96 CAMERA NO. 2

CAMERAMAN JPH

96043745162