



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4614

DATE FILMED 4-28-97 CAMERA NO. 1

CAMERAMAN JMW

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 26 9 55 AM '96

TO: GENERAL COUNSEL--FEDERAL ELECTION COMMISSION
FROM: MR. LARRY BRAYBOY
2335 LANCASHIRE #TB
ANN ARBOR MICHIGAN 48105-1325
RE: COMPLAINT AGAINST PRESIDENT RONALD REAGAN'S 1984 RE-ELECTION
CAMPAIGN FOR TAKING "ILLEGAL" CAMPAIGN CONTRIBUTIONS FROM
THE LATE PHILIPPINE DICTATOR\BUTCHER FERDINAND MARCOS.
DATE: DECEMBER 19,1996

DEAR GENERAL COUNSEL--FEC

I AM WRITING TO YOU FOR THE PURPOSE OF FILING A COMPLAINT AGAINST
THE 1984 REELECTION CAMPAIGN OF PRESIDENT RONALD WILSON REAGAN ON
THE BASIS THAT MR. REAGAN'S CAMPAIGN RECEIVED AN ILLEGAL CAMPAIGN
CONTRIBUTION FROM THE LATE FERDINAND MARCOS OF TEN MILLION DOLLARS.
THE INFORMATION THAT FORMS THE BASIS OF MY COMPLAINT IS OUTLINED IN
THE BOOK "BARE KNUCKLES AND BACK ROOMS" ON PAGES 214-215 WHERE MR.
REAGAN'S 1984 CAMPAIGN MANAGER ED ROLLINS DESCRIBES HOW THE LATE
PHILIPPINE DICTATOR MADE HIS ILLEGAL OFFER. MR. ROLLINS WRITES
THAT THE REPUBLICANS SENT SOMEONE TO PICK UP THE CASH AND THEN
ROLLINS CLAIMS THE REPUBLICAN COURIER NEVER TURNED THE MONEY OVER TO
REAGAN BUT KEPT THE MONEY FOR HIMSELF. MR. ROLLINS NEVER IDENTIFIES
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OFFERED AND ACCEPTED FROM A FOREIGN GOVERNMENT IS ILLEGAL I BELIEVE
THAT MR. ROLLINS NEEDS TO BE PLACED UNDER OATH AND FORCED TO REVEAL
THE IDENTITY OF THE REAGAN CAMPAIGNS ACCOMPLICE IN CRIME.
FURTHER I AM SENDING TO YOU A COPY OF AN ARTICLE BY THE JOURNALIST
ROBERT PARRY FROM THE SEPTEMBER 2, 1996 ISSUE OF THE "CONSORTIUM".
THIS ARTICLE INCLUDES ADDITIONAL INFORMATION TO ASSIST YOUR INVESTIGATION

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OF THE ILLEGAL CAMPAIGN CONTRIBUTION PROVIDED TO THE 1984 REAGAN
REELECTION CAMPAIGN BY THE LATE PHILIPPINE DICTATOR FERDINAND MARCOS
IN VIOLATION OF UNITED STATES ELECTION LAWS. DURING THE TIME MR. MARCOS
RULED THE PHILIPPINES THE UNITED STATES GOVERNMENT PROVIDED MARCOSES
GOVERNMENT HUNDREDS OF MILLIONS OF DOLLARS A YEAR IN ECONOMIC AND
MILITARY AID SO IT IS PROBABLE THAT ANY MONEY OFFERED TO MR. REAGAN'S
CAMPAIGN FROM DICTATOR MARCOS PROBABLY ORIGINATED FROM THE U.S. TREASURY.
THEREFORE IT IS MY DUTY AS A UNITED STATES CITIZEN TO REPORT THIS
ILLEGAL ACT AND TO ASK YOU AS GENERAL COUNSEL AT THE FEDERAL ELECTION
COMMISSION TO INITIATE AN INVESTIGATION OF THE CHARGES I HAVE LAID OUT
TO YOU AS DESCRIBED BY THE FORMER CAMPAIGN MANAGER OF THE 1984 REAGAN
REELECTION CAMPAIGN-MR. ED ROLLINS.

THE REPORTER ROBERT PARRY CAN BE CONTACTED AT:
THE MEDIA CONSORTIUM
2200 WILSON BLVD.
SUITE 102-231
ARLINGTON, VA 22201

SINCERELY YOURS

Larry Brayboy
LARRY BRAYBOY

2335 LANCASHIRE #TB
ANN ARBOR MI 48105-1325

SIGNATURE AND NOTARY ATTACHMENT

Attached to and becoming a part of document dated: December 19, 1996

State of Michigan
County of Washtenaw

The foregoing instrument was acknowledged before me this 19th day of December, 1996,
by Larry Brayboy

My commission expires: 02-10-97

Pamela Huesman
(Notary Public)
County, _____

PAMELA HUESMAN
NOTARY PUBLIC-OAKLAND COUNTY, MICH
ACTING IN WASHTENAW
MY COMMISSION EXPIRES 02-10-97

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STRICTLY CONFIDENTIAL
NOV 14 1984

1) You've called me today regarding the use of the Rollins for Marcos agreement in operations around the Philippines. I am not elaborating on this request because he did not elaborate on this matter either at their meeting. Are you aware of this? If not, I will provide the funding for your instructions and the instructions? I will be contact you until then. Ver returns?

2) Is per your instructions I communicated with Washington regarding the meeting arranged. He direct contact was made with the President due to confusion and the intense publicity. I will advise through in house per our situation. I will advise through in house that we need white house visits to a similar nature. The being and (instead) contact-Clear in house.

3) They will pick up the materials we send to them and will meet today there as well instead of tomorrow. The first batch should be sent to them as per the filing of the second batch with them. I will be making three comments from the three are:

a) 1980-1981 - THE-RECORDS TO CASH
b) 1980-1981 - THE-RECORDS FOR THE
c) 1982-1983 - THE-RECORDS NATIONAL BANK REPORT

4) I expect all the documents checked during his last visit to be in his home soon or in his home "the deal is off". Allow me to look for them myself in order to speed things up and avoid further confusion over this matter. Do you want the documents filed by me or by them?

Thank you, Mr. President

Respectfully,

VICTOR G. SUTUDA

ENTINO



◆ Lost History: Marcos, Money & Treason

By Robert Parry

WASHINGTON -- Republican campaign strategist Ed Rollins has dropped an important clue to the mystery of whether the Reagan-Bush era started in 1980 with an act of treachery that bordered on treason. But it's a clue the mainstream media has misread completely.

In his new book, *Bare Knuckles and Back Rooms*, Rollins recounted a dinner he had with a top Filipino politician in 1991. Over drinks, the man casually asserted that he had delivered an illegal \$10 million cash payment in a suitcase from Philippine president Ferdinand Marcos to Ronald Reagan's 1984 re-election campaign.

"I was the guy who gave the ten million from Marcos to your campaign," the Filipino told Rollins, who was Reagan's 1984 campaign manager. "I was the guy who made the arrangements and delivered the cash personally. ...It was a personal gift from Marcos to Reagan."

Rollins described this stunning news with a light touch. The first thought that raced through his head, he wrote, was "Cash? Holy shit." In the book, Rollins also withheld the names of both the Filipino and the Republican lobbyist who allegedly accepted the cash for Reagan. Rollins suggested, too, that the illegal contribution never reached the campaign or the president. "I knew the lobbyist well and I had no doubt the money was now in some offshore bank," Rollins wrote.

Rollins apparently did not realize that there was a history to the allegations of Ferdinand Marcos paying off Ronald Reagan. Neither did the news organizations that briefly mentioned the cash delivery in their stories about the Rollins book. The news stories gave no larger context, nor was there any editorial demand that the disturbing allegations be investigated. Rollins simply shrugged that the statute of limitations for illegal campaign contributions had probably expired.

But the Marcos-Reagan money story is near the core of the corruption that permeated the

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1980s. Indeed, the story begins when Reagan was battling to unseat President Carter in 1980. Some witnesses who claim knowledge of alleged Reagan efforts to sabotage Carter's negotiations to free 52 U.S. hostages then held in Iran maintain that Marcos contributed some of the money used by Republicans to bribe key Iranian mullahs.

Longtime Friends

Certainly in 1980, Marcos was in Reagan's camp. They had been friends for years, since 1969 when President Nixon assigned Reagan to represent the United States at the gala opening of Imelda Marcos's multi-million-dollar cultural center in Manila. Reagan charmed the Philippine president and his wife as the former beauty queen danced with the former actor.

In 1980, Marcos also was annoyed by Carter's nagging about human rights and frightened by Carter's inability to protect another despot, the shah of Iran, from ouster and a humiliating exile. As U.S. president, Reagan would drop the human rights lectures, look the other way on Marcos's renowned corruption, and defend Marcos as an important Asian ally. Vice President George Bush would even toast Marcos for his "adherence to democratic principles."

Documentary evidence about the alleged Marcos-to-Reagan payoffs first surfaced after Marcos was ousted by a revolution in March 1986. As Marcos's fall neared, Reagan arranged for the dictator to be flown to Hawaii. Marcos's opponents then ransacked government files and found a Feb. 17, 1986, letter signed by a senior Marcos aide, Victor Nituda.

In the letter, Nituda warned Marcos that Reagan's emissary, Sen. Paul Laxalt, R-Nev., was demanding that sensitive files, including ones listing the 1980 transactions, be turned over to the Americans before Marcos could go to Hawaii. Nituda's letter specifically cited accounts set up for Reagan and his 1980 campaign manager William J. Casey, who, in 1986, was Reagan's CIA director.

Laxalt "expects all documents checklisted during his last visit or the deal [for a Hawaiian exile] is off," Nituda wrote. The first two documents listed were "1980-SEC-014: Funds to Casey" and "1980-SEC-015: Reagan Funds Not Used."

In a follow-up letter three days later, Nituda added, "we urgently need to fly the last batch to Clark [Air Force base] soonest. [National security adviser William] Clark and [Reagan chief of staff Michael] Deaver are not happy with what we've sent them so far." Laxalt wanted files from 1984, too, including papers on bank loans and Marcos's "donations to Gen. [John] Singlaub" who was raising money for the Nicaraguan contra rebels.

For years, Laxalt's spokesmen have denied that the senator had any discussions with Marcos about the information referenced in the Nituda letter. In a recent interview, Deaver also told me that he has no idea what Nituda was writing about.

Marcos Admission

But during his Hawaiian exile, Marcos declared that he had given Reagan \$4 million in 1980 and \$8 million in 1984. He made the admission to a Republican lawyer named Richard Hirschfeld, who secretly tape-recorded the conversation. Hirschfeld turned part of the tape over to Congress. But the core allegations -- that President Reagan had received criminal pay-offs from a foreign dictator -- were never seriously explored.

Despite its lack of details, the Rollins book provides important corroboration that Marcos did make sizable illicit payments to Reagan. Rollins wrote, too, that he asked Laxalt about the \$10 million payment when the two men were alone at cabins they own in Front Royal, Va.

"Paul absorbed the story with increasing interest," Rollins wrote. "Christ, now it all makes sense," Laxalt exclaimed. "When I was over there cutting off Marcos's nuts, he gave me a hard time. 'How can you do this?' he kept saying to me. 'I gave Reagan ten million dollars. How can he do this to me?' I didn't know what the hell he was talking about. Now I get it."

Though Laxalt's comment seems self-serving if not disingenuous, it does confirm that he and Marcos discussed the alleged payoffs to Reagan. That contradicts the denials from Laxalt's aides. But it's more likely that Laxalt, who had been chairman of the 1980 Reagan-Bush campaign and was one of Reagan's closest advisers, understood exactly what Marcos was describing.

Hidden Documents?

Hirschfeld, who lives in Charlottesville, Va., also has dangled hints that he possesses bank records showing where many of the Marcos accounts were located and documenting how much money went to Reagan and other Republicans. Yet, when I spoke with Hirschfeld, he refused to release any documentary evidence voluntarily.

But the possibility that a president of the United States was on the payroll of a foreign despot is not insignificant. It is even more troubling if the dictator's money was used to influence the outcome of an American presidential election and lengthen the captivity of 52 Americans held by a hostile state. If true, the allegations would border on treason or at least be accessory to kidnaping. Neither crime has a statute of limitations.

A serious investigation of the Marcos money might shed light, too, on another perplexing mystery from the 1980s: the curious relationship between the American government and the corrupt Bank of Credit and Commerce International. In Jan. 22, 1981, two days after Reagan's Inauguration, Marcos and his cronies co-founded a Hong Kong bank with New York financier John Shaheen, one of Casey's closest friends dating back to the World War II-era Office of Strategic Services.

Called the Hong Kong Deposit and Guaranty, the bank was capitalized with \$20 million supplied by Princess Ashraf, the shah of Iran's strong-willed twin sister who hated Jimmy Carter. The bank attracted onto its board leading BCCI figures, including Abu Dhabi's Ghanim al-Mazrouie and Saudi diplomat Hassan Yassin, the cousin of Iran-contra figure Adnan Khashoggi.

In 1983, the bank collapsed with reported losses of more than \$100 million. The money was never recovered, but Shaheen associates claimed that prior to the bank failure, substantial amounts were funnelled to Marcos, who reportedly was pulling the strings behind the scenes.

The Hong Kong bank might have been a missing link in the intelligence mysteries of the 1980s, connecting the early Reagan-Iran deals with key BCCI players. It also could explain how Marcos was repaid for his alleged 1980 largesse and why he would be even more generous in 1984. Marcos died in exile in 1989.

A Time for Truth

Rollins's book also meshes with other new evidence suggesting that Reagan may have maintained offshore accounts. FBI wiretaps placed in the New York office of Iranian banker Cyrus Hashemi in 1980 picked up comments about a "Reagan overseas corp.," according to a secret FBI summary that I found in the files of the House task force that was appointed in 1992 to investigate the October Surprise allegations.

Though that inquiry ended in a bipartisan whitewash (see *The October Surprise X-Files: The Hidden Origins of the Reagan-Bush Era*), the Rollins's account should compel some official body to re-examine this important historical issue. At minimum, Rollins should be put under oath and compelled to identify both the Filipino with the suitcase and the Republican lobbyist who received it. Then, they should be interrogated. The government also should force Hirschfeld to turn over whatever evidence he has on the bank accounts.

With the Reagan legacy at the heart of Bob Dole's 1996 presidential campaign, there can be no doubt that the American people should know the truth about that legacy. With the Republican convention resonating with impassioned calls for completing the Reagan Revolution, it is not only relevant, but vital, that the voters are given the facts so they can decide for themselves whether that revolution started out as treason.

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 6, 1997

Larry Brayboy
2335 Lancashire #TB
Ann Arbor, MI 48105-1325

Dear Mr. Brayboy:

This is to acknowledge receipt on December 26, 1996, of your letter dated December 19, 1996. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him/her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

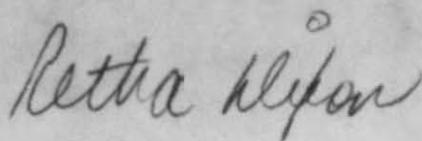
Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

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If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

A handwritten signature in cursive script that reads "Retha Dixon".

Retha Dixon
Docket Chief

Enclosure

cc: Reagan-Bush '84

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orig

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JAN 17 9 58 AM '97

TO: GENERAL COUNSEL--FEDERAL ELECTION COMMISSION

FROM: MR. LARRY BRAYBOY
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DATE: JANUARY 12, 1997

MUR 4614

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SINCERELY YOURS

Larry Brayboy
LARRY BRAYBOY

2335 LANCASHIRE #TB

ANN ARBOR MI 48105-1325

Attachment to document dated January 12, 1996

Larry Brayboy
Larry Brayboy

State of Michigan
County of Washtenaw

Subscribed and sworn to before me this 12th day of January, 1996 by
Larry Brayboy.

Pamela Huesman
Pamela Huesman, Notary Public
Oakland acting in Washtenaw County,
Michigan
My Commission Expires: 02-10-97

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1980s. Indeed, the story begins when Reagan was battling to unseat President Carter in 1980. Some witnesses who claim knowledge of alleged Reagan efforts to sabotage Carter's negotiations to free 52 U.S. hostages then held in Iran maintain that Marcos contributed some of the money used by Republicans to bribe key Iranian mullahs.

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popular herself. In fact, many of my new colleagues told me they were happy to see her go. I could see why. She could be insufferably arrogant. She claimed that my arrival had destroyed the firm's integrity, and resigned in protest. She later went on to be one of the ringleaders of Bill Clinton's corps of adolescent know-it-alls.

Sawyer Miller had decided to get out of domestic political consulting and focus on strategic communications about the time I arrived. But international politicking was still a very lucrative sideline. Most of my business was in strategic communications, but I did some foreign political work as well. One of these assignments took me back to my glory years. At the same time, it reminded me maybe I wasn't as smart as I'd thought.

My 1984 experience running the Reagan reelection had taught me that if you want to be a serious strategist, it's essential to stay above the fray. For the first two weeks of a campaign, the manager decides everything from what goes on the bumper stickers to who sits where. From then on, he has to resist being sucked into the minutiae and begin delegating authority to others. In a national campaign, you're managing three hundred people at headquarters, and thousands more in the field. You can't watch every part of it. Ultimately, you have to have confidence that the people you've put in place aren't freelancing. But there's no way to be sure they aren't.

In 1991, Sawyer Miller was involved in the presidential election in the Philippines. I was making my first trip to Manila counseling Ramon Mitra, the speaker of the Philippine house, who was his party's nominee to succeed Corazon Aquino.

I was invited to dinner at the home of a prominent member of the Philippine congress, a real power broker and household name in Philippine politics. He was well educated, sophisticated, and charming. This guy's middle name would be "Operator" in any language. He met me at his home, where I was introduced to his family. He then took me to the home of his mistress for dinner.

We were having a few drinks and telling some war stories when he said to me, "You ran Reagan's campaign, didn't you?"

I nodded my head. I had no idea where this was heading, but his scotch was damn good.

He smiled. "I was the guy who gave the ten million dollars from Marcos to your campaign."

I nearly dropped my drink onto the very expensive Oriental carpet. As Fiorello La Guardia would say, this was a beaut!

I didn't want to insult my host in front of his mistress by suggesting that perhaps he'd had one pop too many. And I didn't want to admit that I had absolutely no clue what the hell he was talking

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about. But I damn sure wanted to know more about what, if true, was an attempt to make a blatantly illegal contribution from a foreign government to the campaign I'd managed.

"You were the one who gave us that money?"

"Oh, yes," he beamed. "I was the guy who made the arrangements and delivered the cash personally."

Cash? Holy shit, I thought, somebody I know extremely well is walking around Washington one very rich SOB today.

"You know, I can't really remember. It's been seven years. Who did you give the cash to?"

Without batting an eyelash, he gave me the name of a well-known Washington power lobbyist who was involved in the campaign.

"I delivered the suitcase with the cash to him, and helped get it out of the country. He told me he would give it to you for the campaign. It was a personal gift from Marcos to Reagan."

I sat there stunned. Not in a state of total disbelief, though, because I knew the lobbyist well and I had no doubt the money was now in some offshore bank. I wondered if the statute of limitations for illegal campaign contributions was still running. Probably not, I thought.

The guy has made himself quite a fortune as a lobbyist and consultant since 1984. I ran the campaign for \$75,000 a year, and this guy got \$10 million in cash. At least I earned mine honestly.

The next time Paul Laxalt and I were at our Front Royal cabins the same weekend, I suggested we have dinner. "Paul," I said, "I'm going to tell you a story you will not fucking believe."

I laid out what my Philippine acquaintance had told me. Paul absorbed the story with increasing interest.

"Christ, now it all makes sense."

He explained what he meant. In 1985, President Reagan had sent Laxalt as his personal emissary to Marcos with a warning to clean up his act. He thought that a message from his closest friend in the Senate would carry more stroke than if it were delivered by some striped-pants Foreign Service guy.

"When I was over there cutting off Marcos's nuts, he gave me a hard time. 'How can you do this?' he kept saying to me. 'I gave Reagan ten million dollars. How can he do this to me?'"

"I didn't know what the hell he was talking about. Now I get it."

It was a great story. But this flashback quickly rekindled my sense of melancholy. Remembrances of things past served to remind me of what I'd lost, and what I still missed. I was a thoroughbred political animal, put out to pasture. I hated being out of it. As the election season drew closer, I found myself brooding increasingly about the

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 27, 1997

Larry Brayboy
2335 Lancashire, #TB
Ann Arbor, MI 48105-1325

RE: MUR 4614

Dear Mr. Brayboy:

This letter acknowledges receipt on January 17, 1997, of the complaint you filed 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 4614. 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,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure
Procedures

97043794134



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 27, 1997

Angela M. Buchanan, Treasurer
Reagan-Bush '84
11321 Hunt Farm Lane
Oakton, VA 22124

RE: MUR 4614

Dear Ms. Buchanan:

The Federal Election Commission received a complaint which indicates that Reagan-Bush '84 ("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 4614. Please refer to this number in all future correspondence.

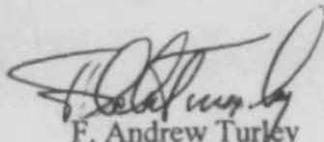
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements 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.

97043794135

If you have any questions, please contact Alva E. Smith at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

97043794136



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 27, 1997

Edward Rollins
Edward J. Rollins Companies
510 King Street, Suite 302
Alexandria, VA 22314

RE: MUR 4614

Dear Mr. Rollins:

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 4614. Please refer to this number in all future correspondence.

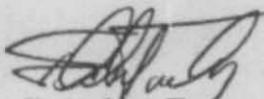
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under 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.

97043794137

If you have any questions, please contact Alva E. Smith at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



F. Andrew Tuxley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

97043794138



THE ROLLINS COMPANY

FEB 10 1 58 PM '97

RECEIVED
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COMMISSION
OFFICE OF GENERAL
COUNSEL

February 3, 1997

Mr. Lawrence M. Nobele
General Counsel
Federal Election Commission

Dear Mr. Nobele,

I was amused and astonished to receive Mr. F. Andrew Tuley's letter of January 27, 1997 regarding a complaint filed against me by Mr. Larry Brayboy of Ann Arbor Michigan, number MUR 4614.

During the last 25 years, I have been involved in numerous Federal campaigns including managing President Reagan's re-election effort in 1984. I have an extensive knowledge of the Federal Campaign Act of 1971 and the various amendments to the act. I've been briefed on the act by some of the best election lawyers in the country. To the best of my knowledge, I have never violated these laws.

Until I received your letter, I had no idea cocktail conversation at a dinner party, 8,000 miles away in the Philippines could result in a complaint against me. Up till now, I always assumed cocktail chatter in Washington, DC or anywhere else would be categorized as hearsay and was not admissible in any kind of legal proceedings.

But since the Federal Election Commission staff may be setting new legal precedent, let me state a few things for the record.

First, Mr. Brayboy misstates in his complaint what I said in my book, *Bare Knuckles and Backrooms*, on pages 214-215.

He mistakenly states that I write that "Republicans sent someone to pick up the cash from Marcos." This is totally untrue and not stated in my book.

Secondly, I can state unequivocally, that there was no contribution received from President Marcos or any other foreign citizen by the Reagan-Bush 84 campaign.

I was the Chief Executive Officer of that campaign and oversaw every expenditure and approved every budget item. In the Fall campaign, we spent the funds allocated to us from the Federal treasury and no more. I also oversaw all fundraising activities and the

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expenditures in the primary campaign. Those contributions were all in accordance with the Federal Election law as your Commission's post election audit proved.

I have no idea, if the Marcos' story as told to me and repeated in my book is true. If it is, then the fraud committed against the late President Marcos should be investigated by the appropriate Philippine law enforcement agencies.

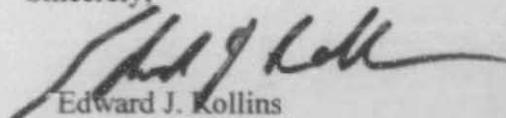
Whatever suspicions I may have as to whether this event took place or not, I have no first hand knowledge. It was for this reason that my attorneys counseled me to exclude the names of the individuals involved in my book.

All that I know for a fact, is that the campaign that I managed for President Reagan fully adhered to all requirements of the Federal Election laws.

I would hope this will end your pursuit of this matter and that Mr. Brayboy's frivolous complaint will be dismissed. By quickly doing so, you and the rest of the FEC staff can get back to investigating the purported illegal campaign practices that took place in this year's Presidential election as has been reported in the front pages of the Washington Post and the New York Times.

If you wish to talk to me further, I can be reached at (212) 704-8271.

Sincerely,

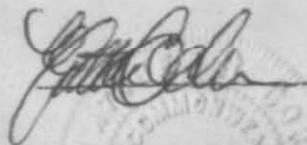


Edward J. Rollins

Certified copy of an original:

County/City of Alexandria
Commonwealth of Virginia

I certify this to be a complete, full, true original document. Certified Feb. 5, 1997



M. Cochran/Notary Public

My Commission Expires August 31, 1997



9704379414C

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JOHN J. DUFFY
(202) 429-8020

February 19, 1997

Lawrence M. Noble, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW, Room 657
Washington, D.C. 20463
Attn: Alva E. Smith

Re: MUR 4614

Dear Mr. Noble:

This is in response to the letter dated January 27, 1997 from F. Andrew Turley to Angela M. Buchanan, Treasurer, Reagan-Bush '84.

The "complaint" supplies a copy of a page from a published book in which the author, Ed Rollins, reports a conversation with an unidentified "prominent member of the Philippine congress, a real power broker." According to Mr. Rollins, the "power broker" stated to Mr. Rollins that he, the power broker, gave ten million dollars to a third party, identified by Mr. Rollins as a Washington lobbyist, to deliver to Reagan-Bush '84. The complainant has no personal knowledge of this alleged transaction; indeed, he has no knowledge of the alleged transaction other than the information he read in Mr. Rollins' book.

Mr. Rollins also states in his book, on the same page, that Reagan-Bush '84 never received the alleged money.

Since the only "evidence" supplied with the complaint establishes that the campaign never received ten million dollars

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February 18, 1997
Page 2

from Mr. Marcos, the "complaint" does not provide any basis for the Commission to find reason to believe that Reagan-Bush '84 "may have violated" the Federal Election Campaign Act of 1971, as amended.

We submit, therefore, that the complaint should promptly be dismissed, and no action taken in MUR 4614.

Sincerely,

John J. Duffy

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CONFIDENTIAL

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COUNSEL

MAR 10 2 39 PM '97

TO: GENERAL COUNSEL--FEDERAL ELECTION COMMISSION
FROM: LARRY BRAYBOY
2335 LANCASHIRE #TB
ANN ARBOR MI 48105-1325
RE: MUR 4614

DEAR GENERAL COUNSEL:

I HAVE RECENTLY COME ACROSS SOME ADDITIONAL INFORMATION THAT MAY FURTHER ASSIST YOU IN YOUR INVESTIGATION OF MY ORIGINAL COMPLAINT FILED AGAINST THE 1984 REAGAN-BUSH REELECTION CAMPAIGN. THIS INFORMATION COMES FROM THE MARCH 17, 1997 ISSUE OF "THE CONSORTIUM" IN AN EDITORIAL WRITTEN BY ROBERT PARRY, A FORMER ASSOCIATED PRESS, NEWSWEEK AND PBS FRONTLINE REPORTER. MR. PARRY NAMES A REPUBLICAN LAWYER, RICHARD HIRSCHFELD AS A PERSON WHO HAS CLAIMED TO POSSESS AUDIOTAPES AND FINANCIAL RECORDS THAT COULD PROVIDE VERIFICATION OF "ALLEGED PAYOFFS " TO THE 1984 REAGAN REELECTION BY THE LATE PHILIPPINE DICTATOR FERDINAND MARCOS. ACCORDING TO MR. PARRY, HIRSCHFELD'S RECORDS ARE STORED AT HIS BANK IN CHARLOTTESVILLE, VA. IF THOSE RECORDS HAVE BEEN MOVED OR DESTROYED IT WOULD APPEAR THAT MR. HIRSCHFELD IS ENGAGED IN A WILLFUL ACT OF OBSTRUCTION OF JUSTICE. I WOULD ENCOURAGE YOU TO CONTACT MR. HIRSCHFELD(ED ROLLINS PROBABLY CAN PROVIDE YOU WITH HIS ADDRESS AND PHONE NUMBER).

ENCLOSED IS A COPY OF THE EDITORIAL WRITTEN BY ROBERT PARRY.

97043794144

SINCERELY YOURS
BEST WISHES

Larry Brayboy 3-7-97
LARRY BRAYBOY 3-7-97

RE:MUR 4614

Larry Brayboy 3-7-97 11:50AM

STATE OF MICHIGAN)
COUNTY OF WASHTENAW) 55
Subscribed and sworn to before me this
date, March 7, 1997
by Larry Brayboy
at Ann Arbor Michigan.
Joyce M Rice

JOYCE M. RICE
NOTARY PUBLIC - WASHTENAW COUNTY, MI
MY COM. EXPIRES 12/31/99

◆ Editorial: The Real Trouble with Washington

Bill Clinton's unseemly decision to turn the White House into the nation's priciest bed and breakfast both illuminates and obscures the real trouble with Washington. What Clinton did was use the White House to reward big-dollar campaign contributors. However he tries to spin those facts, the White House was up for sale.

But the bottom line in Washington is that almost everything and nearly everyone has a price tag. While Clinton deserves the criticism he's getting, it's galling that he's getting it from institutions and individuals whose hands are thoroughly dirty, too.

The Congress, for instance, is adopting the ethically dubious position that only presidential fundraising is fair game, not congressional money-grubbing (which has included letting big contributors literally write their own legislation and distributing special-interest campaign contribution checks on the House floor).

The news media is no more innocent. Its TV stars posture on television about the evils of big money -- and then rush off to corporate meetings to collect \$30,000 speaking fees. *Time* magazine's Margaret Carlson, who doubles as a TV pundit, correctly calls the hefty earnings from some light after-dinner speaking fare "the gravy train."

Many of the opinion journals, which are now so righteously indignant, are not shy about reaching into the deep pockets of their patrons, either. *The American Spectator* crowd collects millions in tax-deductible dollars from well-heeled foundations with political/financial agendas. According to former *National Interest* editor Michael Lind, conservatives writers have developed a "reflexive self-censorship," avoiding topics that might offend the foundations. [See *The Consortium*, Nov. 25, 1996]

Perhaps the leader in this hypocrisy parade is Sun Myung Moon's *Washington Times*, which beats the drum daily about the dangers of mysterious Asian money. But Moon's South Korean-based operation dumps about \$100 million a year into propaganda outlets in Washington and has never publicly accounted for that money (despite a 1978 congressional investigation that linked Moon to an illegal influence-buying scheme by the South Korean CIA).

But selective -- and short -- memories seem a prerequisite for Washington power-brokers. Just last year, GOP consultant Edward Rollins described a \$10 million payoff from Philippine dictator Ferdinand Marcos to a representa-

tive of Ronald Reagan's presidential campaign. In the book, *Bare Knuckles and Back Rooms*, Rollins refused to identify the bag man and it was not clear exactly where the \$10 million ended up. But any serious investigation into illegal foreign campaign money should include sworn testimony by Rollins. [See *The Consortium*, Sept. 2, 1996]

The trail of that Philippine money might also lead to a Republican lawyer, Richard Hirschfeld, who has claimed to possess audiotapes and financial records that bear on the issue of the Marcos payoffs to Reagan. Those records are apparently lodged at Hirschfeld's bank in Charlottesville, Va., in case any government agency would like to go looking.

A serious investigation also would review documentary evidence about foreign intervention in the presidential election of 1980. Those records indicate that a variety of European, Middle Eastern and Asian leaders secretly threw their influence -- and their money -- behind Ronald Reagan. But that evidence was effectively swept under Washington very large -- and lumpy -- carpet by a congressional task force in 1992-93. [For more details, see *The October Surprise X-Files: The Hidden Origins of the Reagan-Bush Era*]

The real trouble with Washington in this modern era is that the money corruption pervades so many institutions and implicates so many figures of power that it is hard to find true allies of reform. Yes, Clinton's political fundraising smells and needs an airing. But for the odor of dirty money to be eliminated, the whole stable must be cleaned out -- the Executive Branch, the Congress and the news media. The contamination must give way to honest alternatives in politics and the press.

Robert Parry, Editor

The Consortium is an independent investigative magazine published biweekly by The Media Consortium, Suite 102-231, 2200 Wilson Blvd., Arlington, VA 22201.

The Consortium is available by mail at the subscription rate of \$34 for one year (26 issues), or \$24 for six months (13 issues). Internet URL: www.delve.com/consort.html. E-mail: rparry@ix.net-com.com.

Robert Parry, Editor and Publisher
Sam Parry, Managing Editor
Nat Parry, General Manager

relating to issues of equitable relief and equitable tolling.¹ *Id.* See also *FEC v. NRSC*, 877 F. Supp. 15, 21 (D.D.C. 1995).

This General Counsel's Report discusses the impact of 28 U.S.C. § 2462 on the Office of General Counsel's enforcement caseload.² This Report describes the active and inactive enforcement matters which are potentially affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462, and makes recommendations for each of the potentially affected matters. This Report addresses all cases where the statute of limitations potentially expires, or partially expires, by the end of calendar year 1997 (December 31, 1997).

The Office of General Counsel is recommending that

18 matters be closed at this time. By doing so, this Office believes that it will be able to devote more resources toward more recent activity, particularly those matters that arose from the 1996 election cycle. To avoid potential statute of limitations problems in the future, this Office will track its cases against the relevant statute of limitations and will perform regular reviews of its caseload. In addition, this Office will be making periodic recommendations to the Commission with respect to matters that may be affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462.

¹ Pending the court's decision, issues such as equitable relief, equitable tolling and ongoing violations, will remain open. In some instances, although issues such as equitable tolling and equitable relief may still be viable, this Office has cited other factors to support our recommendation to close the matter. See, e.g., cases involving apparent violations of 2 U.S.C. § 441a(f).

² This Report addresses enforcement matters assigned to the Public Financing, Ethics & Special Projects ("PFESP") and Enforcement areas.

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III. RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

A. Decline to open a MUR, close the file, and approve the appropriate letters in Pre-MUR 344.

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

1. MUR 4267
2. MUR 4370
3. MUR 4392
4. MUR 4432
5. MUR 4468
6. MUR 4591
7. MUR 4614

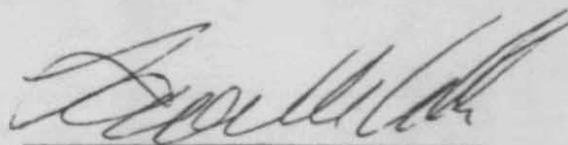
C. Take no further action, close the file and approve the appropriate letters in the following matters:

1. MUR 3351
2. MUR 3571
3. MUR 3582
4. MUR 3586
5. MUR 3838
6. MUR 3841
7. MUR 3969
8. MUR 4091
9. MUR 4183
10. MUR 4209

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3/4/97
Date


Lawrence M. Noble
General Counsel

C. Take no further action, close the file, and approve the appropriate letters in the following matters:

1. MUR 3351;
2. MUR 3571;
3. MUR 3582;
4. MUR 3586;
5. MUR 3838;
6. MUR 3841;
7. MUR 3969;
8. MUR 4091;
9. MUR 4183;
10. MUR 4209.

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

|
(continued)

97043794151

Federal Election Commission
Certification: Agenda Document
#X97-15
March 11, 1997

Page 3

97043794152

Attest:

3-12-97
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Brayboy
2335 Lancashire, TB
Ann Arbor, MI 48105-1325

RE: MUR 4614

Dear Mr. Brayboy:

On January 17, 1997, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering all the facts and circumstances of this case, including but not limited to the applicability of the relevant statute of limitations to some of all of the activity described in the complaint, the Commission has exercised its prosecutorial discretion to take no action in this matter. The Commission reached this determination objectively based upon the information on the record as a whole, the significance of the case relative to others, the amount of time that has elapsed, and other relevant factors. The Commission closed its file in this matter effective March 11, 1997. 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)(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043794153

MUR 4614 (Ronald Reagan's 1984 Reelection Committee)
(complaint-generated)('84 cycle)
Central Enforcement Docket

Complainant Larry Brayboy filed this complaint in January 1997, in which he alleges that Ronald Reagan's 1984 reelection campaign received an illegal campaign contribution of \$10 million from the late Ferdinand Marcos. Mr. Brayboy bases his allegation on a book by Ed Rollins, Reagan's 1984 campaign manager, entitled *Bare Knuckles and Back Rooms*. Based upon the age of the case and lack of underlying evidence, we recommend that this case be closed.

97043794154



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1997

John J. Duffy, Esquire
STEPTOE & JOHNSON, L.L.P.
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

RE: MUR 4614
Reagan-Bush '84 and Angela M. Buchanan, as treasurer

Dear Mr. Duffy:

On January 27, 1997, 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 all the facts and circumstances of this case, including but not limited to the applicability of the relevant statute of limitations to some of all of the activity described in the complaint, the Commission has exercised its prosecutorial discretion to take no further action in this matter. The Commission reached this determination objectively based upon the information on the record as a whole, the significance of the case relative to others, and other relevant factors. The Commission closed its file in this matter effective March 11, 1997.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply; 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 upon receipt.

Please contact me or Alva E. Smith at (202) 219-3400 if you have any questions.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043794155



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1997

Edwin Rollins
The Rollins Company
7732 Southdown Road
Alexandria, VA 22308

RE: MUR 4614

Dear Mr. Rollins:

On January 27, 1997, 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 all the facts and circumstances of this case, including but not limited to the applicability of the relevant statute of limitations to some of all of the activity described in the complaint, the Commission has exercised its prosecutorial discretion to take no further action in this matter. The Commission reached this determination objectively based upon the information on the record as a whole, the significance of the case relative to others, and other relevant factors. The Commission closed its file in this matter effective March 11, 1997.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply; 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 upon receipt.

Please contact me or Alva E. Smith at (202) 219-3400 if you have any questions.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4614

DATE FILMED 4-25-97 CAMERA NO. 1

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