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2000 APR -11 P 2: 01

**CITY CLUB**  
OF WASHINGTON

March 23, 2000

**BOARD OF GOVERNORS**

Frank J. Fahrenkopf, Jr.  
*Chairman*

Senator Bill Bradley  
Senator Robert J. Dole  
*Honorary Members*

William B. Alsup, III  
Thomas Hale Boggs, Jr.  
Alma Arrington Brown  
Mary K. Bush  
Vincent H. Cohen  
Kathleen W. Collins  
Thomas J. Donohue  
Joseph D. Duffey  
Juanita D. Duggan  
Walter R. Fatzinger  
Henry J. Ferrero, Jr.  
Michael J. Fleming  
Craig L. Fuller  
Dean J. Garritson  
Irving Goldstein  
Stephen D. Harlan  
Gerald D. Hines  
Isaac C. Hunt, Jr.  
Marie C. Johns  
James W. Jones  
James L. Kolstad  
Gary Jay Kushner  
M. James Littig  
Floretta Dukes McKenzie  
Bob G. Odle  
Stuart Philip Ross  
Ralph J. Savarese  
Daniel C. Schwartz  
Juan B. Sosa  
Robert G. Vandemark  
Robert B. Washington, Jr.  
Timothy J. Waters  
Joanne W. Young

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

RE: MUR 4984  
Letter of March 13, 2000 from  
John R. Velasquez, Jr.  
Acting Central Enforcement Docket Supervisor

Dear Mr. Velasquez:

I am the Club manager for **City Club of Washington**, and am, as of March 17, 2000 in receipt of your notice of complaint against City Club of Washington. While your letter directed my attention to Jennifer Boyt, I was informed upon calling your office that this matter had been assigned to Alva Smith.

The February 29, 2000 letter of complaint from Andrew Nickelhoff to Lawrence Noble mistakenly charges that the Rogers for Congress campaign received illegal in-kind contributions from City Club of Washington in Washington D.C. This claim references a recent FEC report filed by the Rogers campaign. Included with your correspondence to City Club of Washington is a copy of a Schedule B - Itemized Disbursements report which I assume was filed by the Rogers campaign with FEC. One of the items identifies City Club of Washington as the recipient of two disbursements listed as In-Kind for Catering

City Club of Washington is a private club that offers its Members dining facilities and services. Our records reflect we were asked to provide catering service on December 13, 1999 for an AIA Reception (American Insurance Association). We received a deposit from AIA when the reservation was accepted, and a final payment on December 14, 2000, the day after the reception. Please find enclosed a copy of our invoice summarizing the event, the deposit received and final payment due. Also enclosed are copies of the checks we received in payment from AIA for catering services, and copies of their letters to the Rogers campaign identifying these payments as In-Kind contributions by AIA-PAC.

Columbia Square, Concourse Level, 555 13th Street, N.W.  
Washington, D.C. 20004 202/347-0818

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FEDERAL ELECTION  
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OFFICE OF GENERAL  
COUNSEL  
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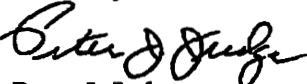
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- Timothy J. Waters
- Joanne W. Young

City Club of Washington did not make any contributions of any kind to the Rogers campaign, and has not violated the Federal Election Campaign Act or any other regulation or law. I would be grateful for your assistance in quickly dismissing City Club of Washington from this complaint. While we appreciate the good faith of the Commission in holding matters under review in confidence, we have already been unfairly charged and identified by name in a press release by the Michigan Democratic Party. Until this matter is resolved and the complaint dismissed, my business can continue to expect damaging notoriety. This has been and will be unfair to our Members, our Employees, and to our shared reputation for integrity in our community.

Please provide me with proper notification that City Club of Washington has been dismissed from this complaint.

Sincerely,  
  
Peter J. Judge  
Club Manager

CC: Alva Smith ✓

- Attachments: Event invoice
- Declaration of In-Kind Contribution Letters
- \*/From AIA-PAC to Rogers campaign (2)
- Copied Checks of disbursement (2)

City Club of Washington

Bill To: SC093  
Customer: Melissa Shelk  
1130 Connecticut Ave. NW  
Suite 1000  
Washington, DC 20036

Invoice Date: 12/14/99  
Work Phone:  
Home Phone:

Event Date: 12/13/99  
Event Name: AIA Reception

Event Type: Reception Business

Menu:	\$295.00
Bar - Liquor:	\$33.25
Wine:	\$6.50
Beer:	\$6.50
Other:	\$ .00
Equipment/Services:	\$ .00
Miscellaneous:	\$ .00
Room Rental:	\$ .00
Gratuuity:	\$68.25
Tax:	\$46.95
Total Charge:	<u>\$450.45</u>
Less Deposit:	\$250.00-
Amount Due:	<u>\$200.45</u>

828-7120

21.19.025.0326



1130 Connecticut Avenue, N.W. v Suite 1000 v Washington, D.C. 20036 v (202) 828-7100

November 23, 1999

Mike Rogers for Congress  
PO Box 581  
Brighton, MI 48116

Attention: Treasurer

TO WHOM IT MAY CONCERN:

The American Insurance Association Political Action Committee has recorded an in-kind contribution to the 2000 primary election campaign of Open Seat candidate Mike Rogers (R-8-MI), totaling \$250.00. This expense was paid by check no. 2239, dated 11/22/99, payable to the City Club of Washington, for the cost of reserving a room for the December 13<sup>th</sup> event planned for Mike Rogers. This expense will be reported on our December 20<sup>th</sup> report to the FEC. To date our total in-kind contributions to the 2000 primary election campaign of Mike Rogers is \$517.24.

If you have any questions regarding this contribution, please do not hesitate to contact me at (202) 828-7120.

Sincerely,

Sean M. McGraw  
AIA-PAC Administrator

21.19.025.0327



**AMERICAN  
INSURANCE  
ASSOCIATION  
POLITICAL ACTION COMMITTEE**

1130 Connecticut Avenue, N.W. v Suite 1000 v Washington, D.C. 20036 v (202) 828-7100

December 15, 1999

Mike Rogers for Congress  
PO Box 581  
Brighton, MI 48116

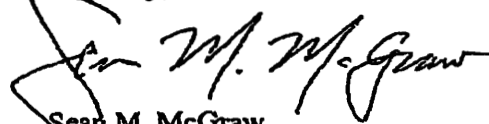
Attention: Treasurer

TO WHOM IT MAY CONCERN:

The American Insurance Association Political Action Committee has recorded three in-kind contribution to the 2000 primary election campaign of Open Seat candidate Mike Rogers (R-8-MI), totaling \$230.55. The first expense was paid by check no. 2247, dated 12/14/99, payable to the City Club of Washington, in the amount of \$200.45, for the cost of the reception held on December 13, 1999. The second expense was paid by check no. 2248, dated 12/14/99, payable to Premiere Technologies, in the amount of \$15.15, for the cost of broadcast faxing the invitation announcing the Mike Rogers event on December 13, 1999. The third expense was paid by check no. 2249, dated 12/14/99, payable to Premiere Technologies, in the amount of \$14.95, for a second broadcast fax of the invitation announcing the Rogers event on December 13, 1999. These expenses will be reported on our Annual report to the FEC. To date our total in-kind contributions to the 2000 primary election campaign of Mike Rogers is \$747.79.

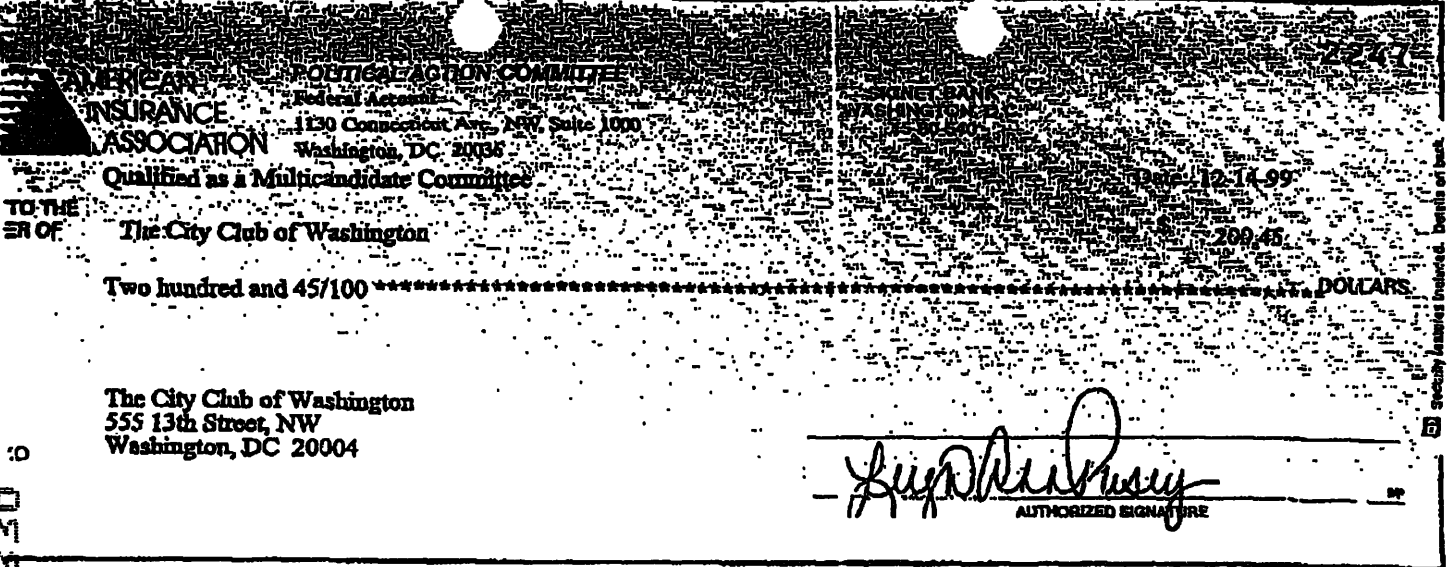
If you have any questions regarding this contribution, please do not hesitate to contact me at (202) 828-7120.

Sincerely,



Sean M. McGraw  
ALA-PAC Administrator

21-19-025-0329



AMERICAN INSURANCE ASSOCIATION  
POLITICAL ACTION COMMITTEE  
Federal Account  
1130 Connecticut Ave., NW, Suite 1000  
Washington, DC 20036  
Qualified as a Multicandidate Committee

TO THE ORDER OF The City Club of Washington

Two hundred and 45/100 \*\*\*\*\* DOLLARS

The City Club of Washington  
555 13th Street, NW  
Washington, DC 20004

*[Signature]*  
AUTHORIZED SIGNATURE

AMERICAN INSURANCE ASSOCIATION POLITICAL ACTION COMMITTEE  
FEDERAL ACCOUNT

Date: 12-14-99  
Marked  
FEC line: FEC 23

Amount: \$200.45

2247

Delivery Notes: In-Kind contribution for Reception held at the City Club on December 13, 1999.

Purpose: In-Kind Contribution: Mike Rogers -US-HOUSE-MI-8  
Office: Federal House  
Election: Primary 2000  
Recipient: The City Club of Washington  
555 13th Street, NW  
Washington, DC 20004

Party: Republican  
State: MI  
District: 8