

MASSEY SHOWALTER & MARSH

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SECRETARIAT
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
92 JAN 24 10:25:21
1100 THE DENVER CLUB BUILDING
SEVENTEENTH STREET
DENVER, COLORADO 80202
TELEPHONE: (303) 592-1100
TELEFAX: (303) 592-7398

January 22, 1992

VIA FEDERAL EXPRESS

Jonathan Levin, Esq.
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20643

Re: CEC, Inc.
AOR 1991-32

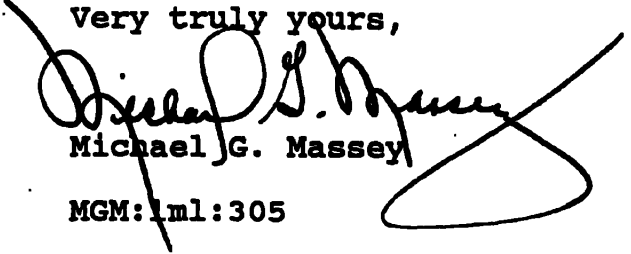
Supplement To
AOR 1991 - 32

RECEIVED
FEDERAL ELECTION COMMISSION
92 JAN 24 PM 3:18

Dear Johnny:

Pursuant to our telephone conversation of January 21, 1991, I have enclosed a "clean" copy of the CEC, Inc. brochure proposed to be used in connection with CEC Inc.'s consulting activities. If you need additional information regarding any of the matters involved in the advisory opinion request submitted by CEC, Inc., please don't hesitate to contact me at your convenience. As always, your cooperation is appreciated.

Very truly yours,


Michael G. Massey

MGM:lml:305

Enclosures

cc: CEC, Inc.
Donald Lansky, Esq.

What is CEC?

CEC, Inc. is a for-profit, political consulting firm that specializes in direct mail fundraising and political organization.

CEC represents primarily non-incumbent Republican candidates for the U.S. House of Representatives. CEC's candidate-clients believe in life, family, country and business.

Why does CEC work with non-incumbents?

Voters want a change. They are tired of special interests dictating the nation's agenda. Yet non-incumbents can't seem to get elected. They don't have enough money. They don't have a strong organization. They can't get their message to enough frustrated voters. CEC will help non-incumbents develop well funded and well organized campaigns that can mount a strong challenge to an entrenched incumbent.

What is unique about CEC's fundraising?

CEC matches an identified conservative donor base with candidates who share the same political perspective. And since CEC has identified donors who have substantial financial resources, CEC candidate-clients are likely to get the maximum contribution. Using an identified donor base reduces the expense of direct mail fundraising, increases the potential return per letter, and permits a greater return of proceeds for the campaign. That's good for the contributor. That's great for the candidate.

Why does CEC emphasize grassroots organization?

Recent political campaigns rely on expensive, impersonal television commercials. There seems to be little time scheduled for direct contact with voters. As a result, elected officials tend to lose touch with the people. CEC wants to put people back into a campaign. That's why a portion of the funds raised by CEC are reserved for grassroots organization. That's also why CEC's candidate-clients will learn how to recruit volunteers, how to campaign door-to-door and how to get each individual voter to the polls on election day. That kind of personal involvement can provide the winning margin in a close race.

How does CEC get paid for their services?

CEC charges the campaign an up-front fee to cover out-of-pocket costs. In addition, CEC receives a percentage of the funds it raises. Because CEC uses an identified donor list and keeps overhead to a minimum, more fundraising proceeds generally are available to candidates.

How does CEC co-ordinate with political parties and PACs?

CEC is a specialized political consulting firm. The services CEC provides to its candidate-clients supplement other services and support candidates receive from political parties, political action committees and other consulting firms.

Why should my name be on CEC's donor list?

Because CEC's candidate-clients and donors share conservative values. CEC representatives personally interview each and every CEC client. When you get a letter from CEC on behalf of a candidate, you can be confident that CEC knows where that candidate stands on important issues. And you never lose your freedom to choose. Whether or not you contribute to a CEC candidate is always up to you. Of course, you'll have to provide information so that the candidate can comply with federal and state election laws.

If I'm on the donor list, will I end up getting junk mail?

CEC retains control over the donor list. The donor list will not be sold to any organization or group. Because CEC has identified the persons on the donor base, CEC, unlike other direct mail fundraising organizations, will send only a minimum number of solicitation letters to each potential contributor.

How can I add my name to the donor list?

Just complete the enclosed form and return it to CEC in the envelope provided. CEC will take care of the rest.

REMINDER: Corporate contributions are prohibited by law. Personal contributions to all federal candidates and federal political committees are limited to a total of \$25,000 annually. You and your spouse may each give up to such limit. Personal contributions shall not exceed \$1000 per candidate for the primary election and \$1000 per candidate for the general election.

(form for spouse, if applicable)

I hereby give my permission for CEC to include my name on their list of potential donors. I understand that I will be solicited by CEC on behalf of specific Congressional candidates.

Signature: _____

(Optional) I am willing to consider contributing a total of \$_____ to candidates for the U.S. House of Representatives.

I am interested in being on CEC's donors list, but would like additional information before committing myself.

Comments/Questions: _____

Name: _____

Address: _____

Telephone: (____) _____

I hereby give my permission for CEC to include my name on their list of potential donors. I understand that I will be solicited by CEC on behalf of specific Congressional candidates.

Signature: _____

(Optional) I am willing to consider contributing a total of \$_____ to candidates for the U.S. House of Representatives.

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