



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1048

Date Filmed 12/27/79 Camera No. --- 2

Cameraman SPC

79040772256



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Re: MUR 1048

Dear Treasurer:

The Commission has reviewed your organization's April 17, 1978, payment of \$1,200 to the Adams County Republican Central Committee and has determined that there is no reason to believe that the 1200 Club violated 2 U.S.C. §§ 433 and 434, which require political committees to file registration statements and reports with the Commission. Your organization's status would change, however, if it should start supporting federal candidates.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles M. Steele", is written over the typed name.

Charles M. Steele
General Counsel

79040172257



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

12/13/79 - JBM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

12/14/79

Re: MUR 1048

Dear Treasurer:

The Commission has reviewed your organization's April 17, 1978, payment of \$1,200 to the Adams County Republican Central Committee and has determined that there is no reason to believe that the 1200 Club violated 2 U.S.C. §§ 433 and 434, which require political committees to file registration statements and reports with the Commission. Your organization's status would change, however, if it should start supporting federal candidates.

Sincerely,

151

Charles N. Steele
General Counsel

7771017258

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Adams County 1200 Club)

MUR 1048

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 12, 1979, the Commission approved by a vote of 5-0 the notification letter to the Adams County 1200 Club which was attached to the Memorandum to the Commission dated December 7, 1979.

Voting for this determination were Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

12/12/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 12-7-79, 4:15
Circulated on 48 hour vote basis: 12-10-79, 11:00

79040172259

December 7, 1979

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1048

Please have the attached Memo and letter distributed
to the Commission on a 48 hour tally basis

Thank you.

79040172260



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

79 DEC 7 P 4: 15

December 7, 1979

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CNS*
General Counsel

SUBJECT: Letter notifying the Adams County 1200 Club
of the Commission's no reason to believe
determination. (MUR 1048)

On November 28, 1979, the Commission determined that there was no reason to believe that the Adams County 1200 Club had violated 2 U.S.C. §§ 433 and 434. Commissioner Reiche suggested, however, that the letter notifying the 1200 Club of the Commission's determination state that the status would change if they start supporting federal candidates. The attached letter has been drafted to incorporate that suggestion.

Attachment
Letter to Adams County 1200 Club

70040172261



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Re: MUR 1048

Dear Treasurer:

The Commission has reviewed your organization's April 17, 1978, payment of \$1,200 to the Adams County Republican Central Committee and has determined that there is no reason to believe that the 1200 Club violated 2 U.S.C. §§ 433 and 434, which require political committees to file registration statements and reports with the Commission. Your organization's status would change, however, if it should start supporting federal candidates.

Sincerely,

Charles N. Steele
General Counsel

72040172262

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Adams County 1200 Club)

MUR 1048

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 28, 1979, the Commission decided by a vote of 5-0 to find no reason to believe that the 1200 Club violated 2 U.S.C. §§433 and 434.

Voting for this determination were Commissioners Aikens, Reiche, Friedersdorf, Harris, and McGarry.

Attest:

11/28/79
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

First General Counsel's Report dated: 11-23-79
Received in Office of the Commission Secretary: 11-23-79, 12:51
Circulated on 48 hour vote basis: 11-26-79, 11:00

79040172263



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

MEMORANDUM TO: CHARLES STEELE *nwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: NOVEMBER 28, 1979
SUBJECT: MUR 1048 - Comments

Attached is a copy of Commissioner Reiche's
vote sheet with comments regarding MUR 1048.

79040172264

ATTACHMENT:
Copy of Vote Sheet

KF

48 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

Date and Time Transmitted: 11-26-79

11:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: 11-28-79

11:00

MUR No. 1048 First General Counsel's Report dated 11-23-79

(☒) I approve the recommendation

() I object to the recommendation

COMMENTS:

But letter to them should recite
that their status would change if they
started supporting Federal candidates.

Date: 11/27/79

Signature:

Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



70010172265

November 23, 1979

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1048

Please have the attached First General Counsel's
Report on MUR 1048 distributed to the Commission on a
48 hour tally basis.

Thank you.

79040172266

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION NOV 23 1979

MUR NO. 1048
DATE COMPLAINT RECEIVED
BY OGC NOV 23 1979

STAFF MEMBER(S) Myerson

COMPLAINANT'S NAME: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Adams County 1200 Club

RELEVANT STATUTE: 2 U.S.C. §§ 433, 434

INTERNAL REPORTS CHECKED: RAD Referral and Adams County Republican Central Committee's Reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

In the course of its normal review of reports filed with the Commission, the Reports Analysis Division ("RAD") found an entry in a report filed by the Adams County Republican Central Committee ("Central Committee") disclosing a \$1,200 contribution from the Adams County 1200 Club ("1200 Club"). RAD referred this matter to the Office of General Counsel to determine whether the 1200 Club is a political committee.

EVIDENCE

This matter involves two organizations -- the Adams County Republican Committee and the Adams County 1200 Club. A. C. Hamilton is treasurer of both organizations.

In 1972 the Central Committee filed a registration statement with the Clerk of the House in which it stated that it would be primarily supporting candidates seeking state and local office. 1/ In October 1978, the Central Committee

1/ Attachment I.

informed the Commission that "[d]ue to the fact that we have not in the past, nor expect to in the future, receive contributions or to financially support any federal candidate(s), we have elected to terminate our reporting." 2/

A review of the reports filed by the Central Committee in 1977 and 1978 did not reveal any expenditures or transfers by that organization to any federal committee. The reports did disclose that the Central Committee received two payments from federal committees as payment for the use of the Central Committee's phone bank. 3/

Hamilton has explained that the 1200 Club was established as a separate committee to comply with state law concerning receipt of raffle proceeds. The Chairman of the Central Committee has further informed the Commission that the 1200 Club represents membership in the Republican Party, that members give individual contributions of \$12.00 per year and that the money is used exclusively to support state and local candidates. 4/ Hamilton also informed the Commission that the 1200 Club has never been, and probably never would be, active federally. 5/

The Central Committee disclosed the receipt of a \$1,200 contribution from the 1200 Club in its July 10, 1978, quarterly report. The money was identified as proceeds from a raffle held on October 28, 1977, and as having been received by the Central Committee on April 17, 1978. 6/ Hamilton explained that the money was raised from a raffle to obtain money for

-
- 2/ The sufficiency of the Central Committee's attempted termination was not included in RAD's referral and will not be addressed herein.

The Central Committee's unequivocal statement that it had not engaged in federal elections in the past, should be compared with its treasurer's statement to Commission staff that the Committee had not supported federal candidates in two years (Attachment II-B) or his subsequent estimate of four or five years (Attachment II-C).

- 3/ See Attachments II-H and II-I.

- 4/ See Attachments II-B, II-C, II-F and II-H.

- 5/ See Attachment II-1.

- 6/ Attachment II-A. The Central Committee's Termination Report disclosed the receipt on October 28, 1978, of an additional \$1,250 contribution from the 1200 Club. The report disclosed that this, too, consisted of the proceeds from the raffle. Attachment III.

7 9 0 4 0 1 7 2 2 6 8

the gubernatorial candidate's campaign, that the major share of the money went to that campaign with the balance going to the Central Committee and that "not one cent went to any federal candidate from the Adams County Republican Central Committee, nor from the Adams County Republican 1200 Club account." 7/

PRELIMINARY LEGAL ANALYSIS

The question raised by this matter is whether there is reason to believe that the 1200 Club is subject to the Act's registration and reporting requirements as a political committee. We think not.

The term "political committee" is defined by the statute (2 U.S.C. § 431(d)) and our regulations (11 C.F.R. § 100.14) to require that the entity anticipate receiving, or receive, contributions, or make expenditures, totalling more than \$1,000 in value during a calendar year. The definitions of the terms "contribution" and "expenditure" require a "purpose of influencing" a federal election. See 2 U.S.C. §§ 431(e), 431(f) and 11 C.F.R. §§ 100.4(a), 100.7(a). Here, the requisite intent was missing, as the money was given to influence only state and local elections and apparently was used only for such elections.

RECOMMENDATION

The Office of General Counsel recommends that the Commission find no reason to believe that the 1200 Club violated 2 U.S.C. §§ 433, 434.

Attachments

(Listed next page)

LIST OF ATTACHMENTS (MUR 1048)

- I. Adams County Republican Central Committee's Registration Statement
- II. Reports Analysis Referral Sheet
- A. October 17, 1978, Letter from Orlando B. Potter to Treasurer, Adams County 1200 Club
 - B. Memorandum re: November 2, 1978, Telephone Conversation Between Chadwick R. Gore and A. C. Hamilton
 - C. Memorandum re: February 26, 1979, Telephone Conversation Between Peggy Sims and A. C. Hamilton
 - D. February 27, 1979, Letter from Joan D. Aikens to the Treasurer, Adams County 1200 Club
 - E. Memorandum re: February 28, 1979, Telephone Conversation Between Lisa Stolaruk and A. C. Hamilton
 - F. March 7, 1979, Letter from A. C. Hamilton to Joan D. Aikens
 - G. Memorandum re: September 26, 1979, Telephone Conversation Between Lisa Stolaruk and A. C. Hamilton
 - H. Memorandum re: September 26, 1979, Telephone Conversation Between Lisa Stolaruk and Hal Shroyer
 - I. Schedule A to Adams County Republican Central Committee's October 10, 1978, Quarterly Report
- III. Schedule A from Central Committee's Termination Report

77010172270

Attachment I

UNITED STATES HOUSE OF REPRESENTATIVES

OFFICIAL MAIL

OCT 24 1972

Office of the Clerk
Washington, D.C.

REGISTRATION FORM AND STATEMENT OF ORGANIZATION FOR A COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR THE U.S. HOUSE OF REPRESENTATIVES AND 23
ANTICIPATING CONTRIBUTIONS OR EXPENDITURES IN EXCESS OF
\$1,000 IN ANY CALENDAR YEAR

REGULATIONS FOR REGISTRATION OF POLITICAL COMMITTEES

(In accordance with the provisions of the Federal Election Campaign Act of 1971, P.L. 92-225)

SEE APPROPRIATE SUPERVISORY OFFICER'S MANUAL FOR ADDITIONAL
REGULATIONS AND INSTRUCTIONS

A. The treasurer of each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the U.S. House of Representatives shall file with the Clerk of the U.S. House of Representatives a Registration Form and Statement of Organization within 10 days after its organization, or, if later, 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the U.S. House of Representatives. Each such committee in existence on April 7, 1972 shall file a Registration Form and Statement of Organization with the Clerk of the U.S. House of Representatives on or before April 11, 1972. Note: If the committee also supports a candidate for the U.S. Senate a similar statement must be filed with the Secretary of the Senate, and if the committee supports a candidate for President or Vice President of the United States a similar statement must be filed with the Commission on the President and Vice President.

B. A copy of this statement shall be filed with the Secretary of State (or, if there is no Office of Secretary of State, the equivalent State officer of the appropriate State).

C. A copy of this statement shall be preserved by the treasurer of the political committee for a period of not less than two (2) years.

D. Any change or correction of information previously submitted in a Registration Form and Statement of Organization shall be reported to the Clerk of the U.S. House of Representatives within ten (10) days following the change or correction. Such amendments to the statement shall contain the date, identity of the committee, the changed or corrected information appropriately identified, and shall be verified by the oath or affirmation of the person filing such information, taken before any officer authorized to administer the oath.

E. Any committee which, after having filed one or more Registration Form and Statement of Organization, disbands or determines it will no longer receive contributions or make expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall so notify the Clerk of the U.S. House of Representatives. Such notification shall be verified by the oath or affirmation of the person filing it, taken before any officer authorized to administer the oath, and such notification shall include a statement as to the disposition of residual funds if the committee is disbanded.

1. Full name of committee: ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE
Mailing address and ZIP code: P.O. Box 61
BRIGHTON COLO 80601
Date of this registration: 10-23-72

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
<u>NONE</u>		

* Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate sheet(s).

3. Area, Scope and Jurisdiction of the Committee:

- (a) Will this committee operate in more than one State? No
- (b) Will it operate on a statewide basis in one State? No
- (c) Will it primarily support candidates seeking State or local office? Both
- (d) Will it support a candidate for the U.S. House of Representatives in an aggregate amount in excess of \$1,000 during the calendar year? No

H.R. ELECTION FORM 1

72000301805

7200030172271

Attachment II

GRAD

92-164

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE

10/17/79

ANALYST

Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW

PS/CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE:

Adams County 1200 Club

TREASURER:

A.C. Hamilton

ADDRESS:

171 South 15th Avenue
Brighton, CO 80601

AFFILIATE(S):

ALLEGATION(S):

Unregistered Political Committee

CITE:

2 U.S.C. 433 & 434

ATTACHMENT(S):

1

DATE INITIATED: 7/31/78

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal review ☐ Other:
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, ~~see Attachment~~

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS \$ _____ TOTAL EXPENDITURES \$ _____

CASH ON HAND \$ _____ DEBTS \$ _____

HISTORY:

RESULTS OF REVIEW:

3SV1/78-118, 10/17/78

3SV2/78-118, 2/27/79

ATTACHMENT

1
2

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon: Gore with Hamilton, 11/2/78

Telecon: Sims with Hamilton, 2/26/79

Telecon: Stolaruk with Hamilton, 2/28/79

Telecon: Stolaruk with Hamilton, 9/26/79

Telecon: Stolaruk with Shroyer, 9/26/79

REASON(S) FOR REFERRAL:

Question of adequacy of response

Response of 3/7/79

ATTACHMENT

3
4
6
7
8

ATTACHMENT

5

OTHER PENDING ACTIONS INITIATED BY RAD:

None

ATTACHMENT

OTHER RELEVANT INFORMATION:

Recipient Committee's Reporting of Transfers from Federal Candidates for

Their Share of Phone Bank Expenses

9

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

Attachment II - A



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

October 17, 1978

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Adams County Republican Central Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

72010172274

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Chadwick R. Gore, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

79040172275

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 16a

Use Separate Schedules for
each numbered line

Name of Candidate or Committee in Full

ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

**ADAMS COUNTY 1200 CLUB
171 S. 15th Ave.
BRIGHTON, Co. 80601**

Principal Place of Business

**CONTRIBUTION FROM
RAFFLE HELD 11-17-77**

Occupation

Date (month
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date **\$1200.00**

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month

day, year)

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month

day, year)

Occupation

SUBTOTAL of receipts this page (optional)

\$ **1200.00**

TOTAL for period (last page this line number only)

\$ **1200.00**

70040172276

DATE: 11/2/78TIME: 10:30 a.m.COMMITTEE: Adams County Republican Cmte - COPERSON SPOKEN TO: Mr. Hamilton 303-659-2151FEC'R: Cladwick R GORESUBJECT: SV on Adams Co 1200 Club

Hamilton called to explain that the receipt from the 1200 Club was the result of a raffle held to raise funds for the gubernatorial candidate. It was a separate committee formed to satisfy state law. This cmte has had no federal activity in two years, according to Hamilton. He sent a termination covering of page 1 yesterday. It does have a bank loan debt of \$3500.

I suggested he submit an FEC Form 3 accounting for cash on hand, and circumstances of the loan having been for county candidates with supporting cover letter explaining the "1200 Club" raffle, source of those tickets. Otherwise, not a proper termination.

MEMORANDUM: FOR FILES

Attachment IIC

ANALYST: Peggy Sims

RE: TELECON

FROM: A. C. Hamilton, Pres. 303/659-2151

DATE: 2/26/78 7:00 PM (approx.)

NAME OF COMMITTEE: Adams Co. Republican Central Committee (Co)
Adams Co. 1200 Club

Mr. Hamilton called re: the YE non-filer RTB mailgram to Adams Co. Rep. C.C. and the SV regarding the unregistered Adams Co.

1200 Club. Mr. Hamilton said that he had called in September about termination and had filed a termination report. He said that the Adams Co. Rep. C.C. had not supported any federal candidates for four or five years. He added that the Adams Co. 1200 Club had been set up to receive the proceeds of a raffle, a portion of which was to go to the Governor of Colorado's campaign and a portion to Adams Co. Rep. Central Committee. He stated that the 1200 Club also did not support federal candidates. He said that he was tired of being "bugged" by the House and the FEC, that his committees were not federal committees. I indicated that I would check the file and would get back to him.

Note: A check of the file revealed that the termination report contained outstanding debts and lacked a statement of residual funds. The file also contained a Q3 '78 report showing receipts for phone bank operations from 2 federal candidates.

Attachment II-D



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20543

February 27, 1979

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Dear Treasurer:

On October 17, 1978, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-1474.

Sincerely,

Joan W. Aikens

Commissioner

Certified Mail:
Return Receipt Requested

72010172279

DATE: 2/28/79TIME: 11:15 AMCOMMITTEE: ADAMS COUNTY REPUB. CENTRAL CMTE.PERSON SPOKEN TO: A.C. F. HAMILTON, TREAS.FEC'R: LISA STOLARUKSUBJECT: REPORTING STATUS

I called Mr. Hamilton to tell him that a Year End Report is required of his committee. He was not too pleased about this, and stated that his committee terminated. However, the termination was not valid due to outstanding debts & no statement of disposition of residual funds. I explained that a pol. cmte could not terminate w/outstanding debts (he seemed to disregard this fact). Mr. Hamilton claims that his cmte. is not a political cmte. as defined by the ACV. This matter is currently being reviewed by the Commission. Mr. Hamilton said that he would send a statement of residual funds (again ignoring the debt factor).

I also told him that we would be sending RFAI's to ~~Letter~~^{HELP} determine their reporting status.

DATE: 9/26/79

TIME: 3:30

COMMITTEE: Adams County Republican Central Committee

PERSON SPOKEN TO: A.C. Hamilton, Treasurer

FEC'R: Lisa Stolaruk

SUBJECT: Various

I called Mr. Hamilton to discuss several matters. The committee sent in a termination report for the 10G in 1978. However, the committee had outstanding debts and obligations as well as no statement of disposition of residual funds. Although the committee is aware of the inadequacy of the termination report, they have not continued to file, nor have they amended their report. They maintain that they are not a political committee, nor have they ever been a political committee during the time of registration with the FEC. I explained that since they were registered, they should abide by the regs. As before, he totally ignored this point, and repeated that they were not a political committee.

Since it is not clear from their reports whether they are, indeed, subject to the FECA, it is possible that they are not a political committee. The only activity that they had federally, were two receipts from Johnson for Congress (\$511) and Armstrong for Senate (\$1000) that were reported as being their share of the phone bank expense. I asked Mr. Hamilton about the phone bank, what sort of questions were asked, and what was done with the results. He suggested that I call Hal Shroyer, the Chairman.

I also informed him that the Adams County 1200 Club has still not registered with the FEC, and that the SV is still outstanding. He maintains that the 1200 club, which is the Republican Party's fundraising vehicle, has never been federally active and probably never will be, has no reason to be registered with the FEC.

79040172281

TELECON

Attachment II - A

DATE: 9/26/79

TIME: 4:00

COMMITTEE: Adams County Republican Central Committee

PERSON SPOKEN TO: Hal Shroyer, Chairman (303)426-8929

FEC'R: Lisa Stolaruk

SUBJECT: Phone bank

I called Mr. Shroyer, per Mr. Hamilton's suggestion. In response to my questions concerning the phone bank operation, Mr. Shroyer said that the two federal candidates, Johnson and Armstrong, paid for the expenses of the phone bank in full. The questions that were asked were, "If the election were held today, would you vote for candidate A or B?" The results were apparently used by the Republican Party to indicate their strength.

Since my conversations with Mr. Hamilton have not met with much success, I reiterated the problems that we have with the committee's termination report, as well as the outstanding matter relating to the 1200 Club. Mr. Shroyer responded exactly as Mr. Hamilton did. (See Telecon of 9/26 with Hamilton for details) It is apparent that the committee does not intend to file with the FEC, or to terminate adequately. Past and present communications between RAD and the committee have failed to generate any constructive resolution of the problems. However, upon my request, Mr. Shroyer agreed to send a letter to the Commission outlining the non-federal status of both the Central Committee and the 1200 Club.

Aside: Shroyer said that the 1200 Club was composed of individual contributions of \$12.00 per year, and represented membership in the Republican Party. The money is used exclusively to support state and local candidates. He also gave me a new address for the Central Committee for future use:

P.O. Box 608
Westminster, CO 80030

7 2 0 4 0 1 7 2 2 8 2

Attachment II - I

SCHEDULE A
REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3Page 1 of 1 forLine Number 15a(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

JOHNSON FOR CONGRESS**COMMITTEE****FORT COLLINS, CO. 80547**

Principal Place of Business

**SHARE OF
PHONE BANK EXPENSE AT
ADAMS CO. REPUB. HQ**

Occupation

☐ Check if Contributor is self-employedDate (month,
day, year)Amount of each Receipt
this Period

Receipt for:

☐ Primary ☐ General ☒ Other

Aggregate Year-To-Date

9-10-78**\$511.00**

Full Name, Mailing Address and ZIP Code

ARMSTRONG FOR SENATE**COMMITTEE****AURORA, CO 80010**

Principal Place of Business

**SHARE OF
PHONE BANK EXPENSE AT
ADAMS CO. REPUB. HQ**

Occupation

☐ Check if Contributor is self-employedDate (month,
day, year)Amount of each Receipt
this Period

Receipt for:

☐ Primary ☐ General ☒ Other

Aggregate Year-To-Date

9-26-78**\$1000.00**

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)Amount of each Receipt
this Period

Receipt for:

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year-To-Date

Date (month,
day, year)Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year-To-Date

Date (month,
day, year)Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year-To-Date

Date (month,
day, year)Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year-To-Date

Date (month,
day, year)Amount of each Receipt
this Period

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Receipt for:

☐ Primary ☐ General ☐ Other☐ Check if Contributor is self-employed

Aggregate Year-To-Date

SUBTOTAL of receipts this page (optional)

\$1511.00

TOTAL this period (last page this line number only)

\$1511.00

7907807223300

Schedule A

July 1976

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20043Attachment III
Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 1

LINE NUMBER 15a

Is the separate contribution(s) for each
recipient(s) listed?

Name of Candidate or Committee in full

ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, mailing address and ZIP code

ADAMS COUNTY 1200 CLUB
171 SO. 15TH AVE
BRIGHTON, CO 80601Date (month,
day, year)Amount of each
receipt this period

Principal place of business

CONTRIBUTION FROM
RUFFLE HELD 10-28-77

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$ 2430.00

10-28-78

\$ 1250.00

Full Name, mailing address and ZIP code

TRUMPETEERS OF ADAMS COUNTY
WESTMINSTER, CO 80030Date (month,
day, year)Amount of each
receipt this period

Principal place of business

DONATION

Occupation

WOMEN'S POLITICAL CLUB.

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$

10-18-78

\$ 500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date

▶ \$

Subtotal of receipts this page (optional)

▶ \$ 1750.00

Total this period (last page this line number only)

▶ \$ 1750.00

Page

7034017021871

Attachment II-F

FEDERAL ELECTION
COMMISSION

'79 MAR 12 AM 10:23

March 7, 1979

Joan D. Aikens, Commissioner
Federal Election Commission
1325 K Street N W
Washington, D. C. 20463

502806

Dear Commissioner:

3SV2/78-118

This letter is an attempt to advise you in writing and to confirm what I have previously explained via telephone conversations with your office.

In October 1978, I submitted the front page of the Report of Receipts and Expenditures and marked it as a Termination Report. I was advised by your office to submit a complete termination report through October 1978 which would satisfy the requirements for a termination report. In compliance with the advice received from your office I submitted a termination report dated 11-6-78 showing receipts and expenditures through October 31, 1978. The report was mailed with a cover letter stating, "Due to the fact that we have not in the past, nor expect to in the future, receive contributions or to financially support any federal candidate(s), we have elected to terminate our reporting."

The Adams County Republican Central Committee is an ongoing political committee, and as such will always have a bank balance, accounts payables, and/or accounts receivables. At the present time we have a note at the First National Bank of Westminster, Colorado. We borrowed \$3500.00 to financially support our COUNTY CANDIDATES. Not one penny was contributed to a federal candidate, neither as a cash donation nor a donation in kind.

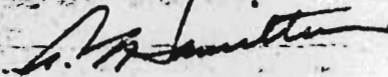
You have questioned a \$1250.00 contribution to the Adams County Republican Central Committee by the Adams County 1200 Club. As explained to your people, The Adams County 1200 Club was set up to qualify for a State bingo license so that we could raffle a car to obtain money for the support of the Republican Candidate for Governor of the State of Colorado. The candidate for Governor's committee received the major share of the monies realized from the raffle with the balance to the Adams County Republican Central Committee. Again, not one cent went to any federal candidate from the Adams County Republican Central Committee, nor from the Adams County Republican 1200 Club account. I, the writer of this letter, am the Treasurer of both the Adams County Republican Central Committee and the Adams County 1200 Club and I can assure you the above statement is true and correct.

We are not required, under federal law, to file any federal reports or receipts and expenditures and it was a mistake that we filed in the

7 2 0 4 0 1 7 2 2 8 5

first place. We have been advised by legal counsel that we do not have an obligation to report federally since we have not supported financially, or in kind, nor have we received contributions from any federal candidate(s).

Yours very truly,



Treasurer
Adams County Republican Central Committee

cc: Hal Shroyer, Chairman
Al Kreinberg, Audit Chairman

djs

77010172285

MEMORANDUM

TO: WILLIAM OLDAKER
ATTENTION: LESTER SCALL

THROUGH: ORLANDO B. POTTER *OBP.*

FROM: THOMAS C. HASELHORST *TH*

SUBJECT: REFERRALS FOR TWIN FALLS DEMOCRATIC CLUB AND ADAMS COUNTY 1200 CLUB

Please note that situational questions regarding the Twin Falls Democratic Committee and the Adams County 1200 Club were previously sent to your office on April 2, 1979.

79010172287

NOTE
PREVIOUS REFERRALS FROM RVD:
BANK STATE OF PHONE BANK EXPENSES
REGISTRATION COMMITTEE'S REPORTING OF TRANSFERS FROM REGULAR CONTRIBUTION FOR
OTHER RELEVANT INFORMATION

D
D 96-164

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE

10/17/79

ANALYST

Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

10/18/79

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW

PS/CB

FROM:

ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

[Signature]

CANDIDATE/COMMITTEE:

Adams County 1200 Club

TREASURER:

A.C. Hamilton

ADDRESS:

171 South 15th Avenue
Brighton, CO 80601

AFFILIATE(S):

ALLEGATION(S):

Unregistered Political Committee

CITE:

2 U.S.C. 433 & 434

ATTACHMENT(S)

1

DATE INITIATED: 7/31/78

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal review ☐ Other:
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1

PERIOD COVERED FROM _____ TO _____

TOTAL RECEIPTS \$ _____ TOTAL EXPENDITURES \$ _____

CASH ON HAND \$ _____ DEBTS \$ _____

HISTORY:

RESULTS OF REVIEW:

3SV1/78-118, 10/17/78

3SV2/78-118, 2/27/79

ATTACHMENT

1

2

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Gore with Hamilton, 11/2/78

3

Telecon: Sims with Hamilton, 2/26/79

4

Telecon: Stolaruk with Hamilton, 2/28/79

6

Telecon: Stolaruk with Hamilton, 9/26/79

7

Telecon: Stolaruk with Shroyer, 9/26/79

8

REASON(S) FOR REFERRAL:

ATTACHMENT

Question of adequacy of response

5

Response of 3/7/79

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

Recipient Committee's Reporting of Transfers from Federal Candidates for

Their Share of Phone Bank Expenses

9

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

October 17, 1978

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Adams County Republican Central Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

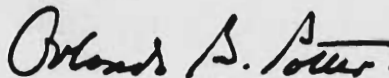
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

79040172290

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Chadwick R. Gore, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-1474.

Sincerely,



Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

72010172291

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20045

ITEMIZED RECEIPTS

(Contributions, Transfers, Contributions in Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 16a

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

**ADAMS COUNTY 1200 CLUB
171 S. 15TH AVE.
BRIGHTON, CO. 80601**

Principal Place of Business

**CONTRIBUTION FROM
RAFFLE HELD 10-18-77**

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ **1200.00**

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)

Amount of each Receipt
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

SUBTOTAL of receipts this page (optional)

\$ **1200.00**

TOTAL this period (last page this line number only)

\$ **1200.00**

079040172292

DATE: 11/2/78TIME: 10:30 a.m.COMMITTEE: Adams County Republican Cmte - COPERSON SPOKEN TO: Mr. Hamilton 303-659-2151FEC'R: Cladwick R GORESUBJECT: SV on Adams Co 1200 Club

Hamilton called to explain that the receipt from the 1200 Club was the result of a raffle held to raise funds for the gubernatorial candidate. It was a separate committee formed to satisfy state law. This cmte has had no federal activity in two years, according to Hamilton. He sent a termination consisting of page 1 yesterday. It does have a bank loan debt of \$3500.

I suggested he submit an FEC Form 3 accounting for cash on hand, and circumstances of the loan having been for county candidates with supporting cover letter explaining the "1200 Club" raffle, source of those tickets. Otherwise, not a proper termination.

79040172293-

MEMORANDUM: FOR FILES

ANALYST: Peggy Sims

RE: TELECON

FROM: A. C. Hamilton, Pres. 303/659-2151

DATE: 2/26/78 7:00 PM (approx.)

NAME OF COMMITTEE: Adams Co. Republican Central Committee (Co)
Adams Co. 1200 Club

Mr. Hamilton called re: the YE non-filer RTB mailgram to Adams Co. Rep. C.C. and the SV regarding the unregistered Adams Co.

1200 Club. Mr. Hamilton said that he had called in September about termination and had filed a termination report. He said that the Adams Co. Rep. C.C. had not supported any federal candidates for four or five years. He added that the Adams Co. 1200 Club had been set up to receive the proceeds of a raffle, a portion of which was to go to the Governor of Colorado's campaign and a portion to Adams Co. Rep. Central Committee. He stated that the 1200 Club also did not support federal candidates. He said that he was tired of being "bugged" by the House and the FEC, that his committees were not federal committees. I indicated that I would check the file and would get back to him.

Note: A check of the file revealed that the termination report contained outstanding debts and lacked a statement of residual funds. The file also contained a Q3 '78 report showing receipts for phone bank operations from 2 federal candidates.

79040172294



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

February 27, 1979

Treasurer
Adams County 1200 Club
171 South 15th Avenue
Brighton, Colorado 80601

Dear Treasurer:

On October 17, 1978, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-1474.

Sincerely,

Joan W. Atkins

Commissioner

Certified Mail:
Return Receipt Requested

70040172295

7 2 0 1 0 1 7 2 2 9 6

35V1/78-118

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered c
☒ Show to whom, date, and address of delivery c
☐ RESTRICTED DELIVERY
 Show to whom and date delivered c
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Adams City 1200 Club
 CO

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943665

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
 Lee M. Hamilton

4. DATE OF DELIVERY 10/20/8 POSTMARK

5. ADDRESS (Complete only if requested)
 171 S. 15th
 Brighton Co. 80601

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

10/17 ☆GPO: 1977-0-248-595

35V2/78-118

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered c
☒ Show to whom, date, and address of delivery c
☐ RESTRICTED DELIVERY
 Show to whom and date delivered c
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Adams City 1200 Club
 CO

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 38673

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
 Lee M. Hamilton

4. DATE OF DELIVERY MAR - 2 1979 POSTMARK
 MAR - 2 1979

5. ADDRESS (Complete only if requested)
 171 S. 15th
 Brighton Co. 80601

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

2/27

☆GPO: 1977-0-248-595

DATE: 2/28/79TIME: 11:15 AMCOMMITTEE: ADAMS COUNTY REPUB. CENTRAL CMTE.PERSON SPOKEN TO: A.C. F. HAMILTON, TREAS.FEC'R: LISA STOLARUKSUBJECT: REPORTING STATUS

7 9 0 4 0 1 7 2 2 9 7
I CALLED Mr. Hamilton to tell him that a Year End Report is required of his Committee. He was not too pleased about this, and stated that his Committee terminated. However, the termination was not valid due to outstanding debts & no statement of disposition of residual funds. I explained that a pol. cmte could not terminate w/outstanding debts (he seemed to disregard this fact). Mr. Hamilton claims that his Cmte. is not a political cmte. as defined by the ACV. This matter is currently being reviewed by the Commission. Mr. Hamilton said that he would send a statement of residual funds (again ignoring the debt factor).

I also told him that we would be sending RFAI's to ~~Get~~^{HELP} determine their reporting status.

FEDERAL ELECTION
COMMISSION

79 MAR 12 AM 10:23

March 7, 1979

Joan D. Aikens, Commissioner
Federal Election Commission
1325 K Street N W
Washington, D. C. 20463

802300

Dear Commissioner:

3SV2/78-118

This letter is an attempt to advise you in writing and to confirm what I have previously explained via telephone conversations with your office.

In October 1978, I submitted the front page of the Report of Receipts and Expenditures and marked it as a Termination Report. I was advised by your office to submit a complete termination report through October 1978 which would satisfy the requirements for a termination report. In compliance with the advice received from your office I submitted a termination report dated 11-6-78 showing receipts and expenditures through October 31, 1978. The report was mailed with a cover letter stating, "Due to the fact that we have not in the past, nor expect to in the future, receive contributions or to financially support any federal candidate(s), we have elected to terminate our reporting."

The Adams County Republican Central Committee is an ongoing political committee, and as such will always have a bank balance, accounts payables, and/or accounts receivables. At the present time we have a note at the First National Bank of Westminster, Colorado. We borrowed \$3500.00 to financially support our COUNTY CANDIDATES. Not one penny was contributed to a federal candidate, neither as a cash donation nor a donation in kind.

You have questioned a \$1250.00 contribution to the Adams County Republican Central Committee by the Adams County 1200 Club. As explained to your people, The Adams County 1200 Club was set up to qualify for a State bingo license so that we could raffle a car to obtain money for the support of the Republican Candidate for Governor of the State of Colorado. The candidate for Governor's committee received the major share of the monies realized from the raffle with the balance to the Adams County Republican Central Committee. Again, not one cent went to any federal candidate from the Adams County Republican Central Committee, nor from the Adams County Republican 1200 Club account. I, the writer of this letter, am the Treasurer of both the Adams County Republican Central Committee and the Adams County 1200 Club and I can assure you the above statement is true and correct.

We are not required, under federal law, to file any federal reports or receipts and expenditures and it was a mistake that we filed in the

72010172298

first place. We have been advised by legal counsel that we do not have an obligation to report federally since we have not supported financially, or in kind, nor have we received contributions from any federal candidate(s).

Yours very truly,



Treasurer
Adams County Republican Central Committee

cc: Hal Shroyer, Chairman
Al Kreinberg, Audit Chairman

djs

7 2 0 1 0 1 7 2 2 9 9

DATE: 9/26/79

TIME: 3:30

COMMITTEE: Adams County Republican Central Committee

PERSON SPOKEN TO: A.C. Hamilton, Treasurer

FEC'R: Lisa Stolaruk

SUBJECT: Various

I called Mr. Hamilton to discuss several matters. The committee sent in a termination report for the 10G in 1978. However, the committee had outstanding debts and obligations as well as no statement of disposition of residual funds. Although the committee is aware of the inadequacy of the termination report, they have not continued to file, nor have they amended their report. They maintain that they are not a political committee, nor have they ever been a political committee during the time of registration with the FEC. I explained that since they were registered, they should abide by the regs. As before, he totally ignored this point, and repeated that they were not a political committee.

Since it is not clear from their reports whether they are, indeed, subject to the FECA, it is possible that they are not a political committee. The only activity that they had federally, were two receipts from Johnson for Congress (\$511) and Armstrong for Senate (\$1000) that were reported as being their share of the phone bank expense. I asked Mr. Hamilton about the phone bank, what sort of questions were asked, and what was done with the results. He suggested that I call Hal Shroyer, the Chairman.

I also informed him that the Adams County 1200 Club has still not registered with the FEC, and that the SV is still outstanding. He maintains that the 1200 club, which is the Republican Party's fundraising vehicle, has never been federally active and probably never will be, has no reason to be registered with the FEC.

79040172300

7

DATE: 9/26/79

TIME: 4:00

COMMITTEE: Adams County Republican Central Committee

PERSON SPOKEN TO: Hal Shroyer, Chairman (303)426-8929

FEC'R: Lisa Stolaruk

SUBJECT: Phone bank

I called Mr. Shroyer, per Mr. Hamilton's suggestion. In response to my questions concerning the phone bank operation, Mr. Shroyer said that the two federal candidates, Johnson and Armstrong, paid for the expenses of the phone bank in full. The questions that were asked were, "If the election were held today, would you vote for candidate A or B?" The results were apparently used by the Republican Party to indicate their strength.

Since my conversations with Mr. Hamilton have not met with much success, I reiterated the problems that we have with the committee's termination report, as well as the outstanding matter relating to the 1200 Club. Mr. Shroyer responded exactly as Mr. Hamilton did. (See Telecon of 9/26 with Hamilton for details) It is apparent that the committee does not intend to file with the FEC, or to terminate adequately. Past and present communications between RAD and the committee have failed to generate any constructive resolution of the problems. However, upon my request, Mr. Shroyer agreed to send a letter to the Commission outlining the non-federal status of both the Central Committee and the 1200 Club.

Aside: Shroyer said that the 1200 Club was composed of individual contributions of \$12.00 per year, and represented membership in the Republican Party. The money is used exclusively to support state and local candidates. He also gave me a new address for the Central Committee for future use:

P.O. Box 608
Westminster, CO 80030

79040172301

8

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Line Number 15a

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full				
ADAMS COUNTY REPUBLICAN CENTRAL COMMITTEE				
Full Name, Mailing Address and ZIP Code JOHNSON FOR CONGRESS Committee 8547 FOOT COLLINS, COLO.	Principal Place of Business SHARE OF PHONE BANK EXPENSE AT ADAMS Co. REPUB. HQ Occupation POLITICAL COMMITTEE ☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	Date (month, day, year) 9-10-78	Amount of each Receipt this Period \$511.00	
Receipt for: ☒ Primary ☐ General ☒ Other	Full Name, Mailing Address and ZIP Code ARMSTRONG FOR SENATE Committee ANRORA, CO 80010	Principal Place of Business SHARE OF PHONE BANK EXPENSE AT ADAMS Co. REPUB. HQ. Occupation POLITICAL COMMITTEE ☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	Date (month, day, year) 9-26-78	Amount of each Receipt this Period \$1,000.00
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$1511.00	
TOTAL this period (last page this line number only)			\$1511.00	



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1048

Date Filmed 12/27 Camera No. --- 2

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