



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1834

Date Filmed 2/21/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing Slips

Internal Memos & Documents

Rough Drafts

Proprietary Commercial Documents

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|---|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☒ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Robert Martin

Date

1/7/86

RECEIVED AT THE FEC
600# 9075
BEFORE THE FEDERAL ELECTION COMMISSION 85 NOV 29 49:06

In the Matter of)
)
Conservative Commemorative)
Society, Inc.) MUR 1834
)
Great Through '88 and L. William)
Troxler, as Treasurer)

CONCILIATION AGREEMENT

8 6 7 4 0 5 6 5 3 4 8
This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Conservative Commemorative Society, Inc. (the "Society") and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. §§ 441d(a)(3) and 441b and that Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4). The Society, Great Through '88 and L. William Troxler, Great Through '88's treasurer, are jointly referred to as the "Respondents."

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts are as follows:

1. Mr. Troxler is the Director of the Conservative Commemorative Society, a Michigan corporation.
 2. Mr. Troxler is the Treasurer of Great Through '88, a political committee registered with the Commission. Great Through '88 is not connected to any organization or affiliated with any other political committee.
 3. During the fall of 1984, the Conservative Commemorative Society, Inc. spent at least \$32,223 in corporate funds to coordinate, finance, and market a project to raise funds for Great Through '88. The Society mailed at least 105,000 letters that solicited contributions and advocated Ronald Reagan's reelection.
 4. Great Through '88 did not file reports disclosing the in-kind contributions it received from the Conservative Commemorative Society, Inc. until August 1985.
- V. 1. 2 U.S.C. § 441b prohibits corporate contributions and prohibits political committees from receiving corporate contributions. The Respondents violated 2 U.S.C. § 441b because the Conservative Commemorative Society, Inc. used corporate funds on behalf of Great Through '88.
2. 2 U.S.C. § 441d requires a disclaimer statement whenever a person makes a political solicitation or communication

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expressly advocating a candidate for federal office. The term "person" includes corporations. 2 U.S.C. § 431(11). The Respondents violated 2 U.S.C. § 441d(a)(3) because the letters that solicited contributions and advocated Ronald Reagan's reelection did not contain disclaimer statements.

3. Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the reports of receipts and disbursements required by the Commission in a timely manner.

VI. 1. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Thousand Dollars (\$3,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity that is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. 1. One thousand dollars (\$1,000) of the civil penalty shall be due by March 15, 1986.

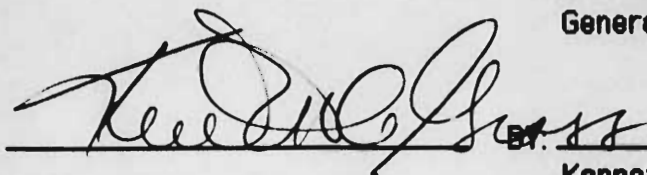
X. 2. One thousand dollars (\$1,000) of the civil penalty shall be due by April 15, 1986.

X. 3. One thousand dollars (\$1,000) of the civil penalty shall be due by May 15, 1986.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION

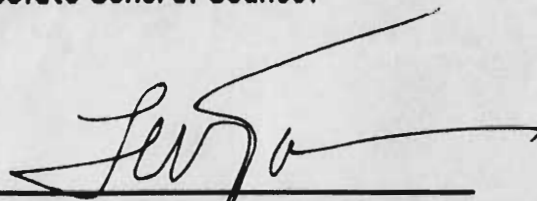
Charles N. Steele
General Counsel



BY: 11/8/86
Kenneth Gross
Associate General Counsel

FOR THE RESPONDENTS

Nov. 22, 1985
Date


L. William Troxler, Director of the
Conservative Commemorative Society
Inc., Treasurer of Great Through '88

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Conservative Commemorative
Society, Inc.

Great Through '88 and
L. William Troxler, as
treasurer

MUR 1834

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on January 2,
1986, the Commission decided by a vote of 4-0 to take
the followings actions in MUR 1834:

1. Accept the conciliation agreement attached
to the General Counsel's Report signed
December 19, 1985.
2. Send the letter attached to the General
Counsel's Report signed December 19, 1985.
3. Close the file.

Commissioners Elliott, Harris, McDonald and McGarry
voted affirmatively for this decision; Commissioners Aikens,
and Josefiak did not cast a vote.

Attest:

1-3-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 12-20-85, 3:04
Circulated on 48 hour tally basis: Mon., 12-23-85, 11:00
Deadline for vote: Thurs., 1-2-86, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1986

L. William Troxler
1730 Glendon Avenue, Suite 11
Los Angeles, California 90024

RE: MUR 1834
Conservative Commemorative
Society, Inc., and Great
Through '88 and
L. William Troxler, as
treasurer

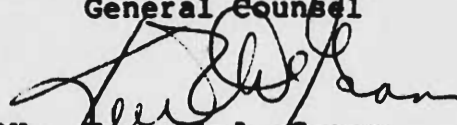
Dear Mr. Troxler:

On January 2, 1986, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. §§ 441d(a)(3), 441b, and 434(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

In the Matter of)
)
Conservative Commemorative)
Society, Inc.) MUR 1834
)
Great Through '88 and L. William)
Troxler, as Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Conservative Commemorative Society, Inc. (the "Society") and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. §§ 441d(a)(3) and 441b and that Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4). The Society, Great Through '88 and L. William Troxler, Great Through '88's treasurer, are jointly referred to as the "Respondents."

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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AID: 9

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts are as follows:

1. Mr. Troxler is the Director of the Conservative Commemorative Society, a Michigan corporation.

2. Mr. Troxler is the Treasurer of Great Through '88, a political committee registered with the Commission. Great Through '88 is not connected to any organization or affiliated with any other political committee.

3. During the fall of 1984, the Conservative Commemorative Society, Inc. spent at least \$32,223 in corporate funds to coordinate, finance, and market a project to raise funds for Great Through '88. The Society mailed at least 105,000 letters that solicited contributions and advocated Ronald Reagan's reelection.

4. Great Through '88 did not file reports disclosing the in-kind contributions it received from the Conservative Commemorative Society, Inc. until August 1985.

V. 1. 2 U.S.C. § 441b prohibits corporate contributions and prohibits political committees from receiving corporate contributions. The Respondents violated 2 U.S.C. § 441b because the Conservative Commemorative Society, Inc. used corporate funds on behalf of Great Through '88.

2. 2 U.S.C. § 441d requires a disclaimer statement whenever a person makes a political solicitation or communication

expressly advocating a candidate for federal office. The term "person" includes corporations. 2 U.S.C. § 431(11). The Respondents violated 2 U.S.C. § 441d(a)(3) because the letters that solicited contributions and advocated Ronald Reagan's reelection did not contain disclaimer statements.

3. Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the reports of receipts and disbursements required by the Commission in a timely manner.

VI. 1. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Three Thousand Dollars (\$3,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity that is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. 1. One thousand dollars (\$1,000) of the civil penalty shall be due by March 15, 1986.

X. 2. One thousand dollars (\$1,000) of the civil penalty shall be due by April 15, 1986.

X. 3. One thousand dollars (\$1,000) of the civil penalty shall be due by May 15, 1986.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION

Charles N. Steele
General Counsel

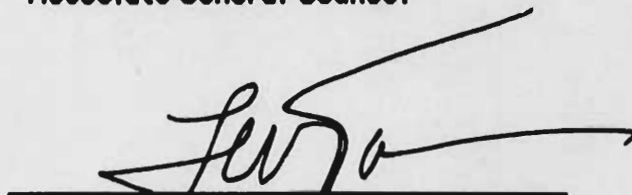


Kenneth Gross
Associate General Counsel

1/8/86

FOR THE RESPONDENTS

Nov. 22, 1985
Date



L. William Troxler, Director of the
Conservative Commemorative Society
Inc., Treasurer of Great Through '88

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Conservative Commemorative
Society, Inc.

Great Through '88 and
L. William Troxler, as
treasurer

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MUR 1834

SENSITIVE

GENERAL COUNSEL'S REPORT

BACKGROUND

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This matter presently involves the Commission's findings concerning three violations of the Act. First, the Commission has found reason to believe that the Conservative Commemorative Society, Inc. ("the Society") violated 2 U.S.C. § 441d(a)(3) by failing to attach proper disclaimers to mailed solicitations. Second, the Commission has found reason to believe that the Society and Great Through '88 (a political committee registered with the Commission) and L. William Troxler, as treasurer, violated 2 U.S.C. § 441b by respectively making, and accepting, a corporate contribution in connection with a federal election campaign. Third, the Commission has found reason to believe that Great Through '88 and L. Willilam Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4) by faililng to file a required report with the Commission.

At the respondents' request, the Commission entered into pre-probable cause conciliation and approved a conciliation aqreement providing for

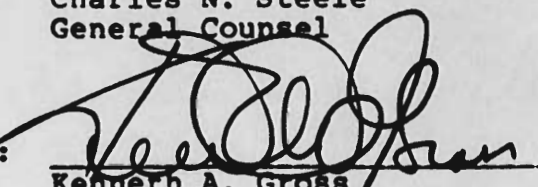
RECOMMENDATIONS

1. Accept the attached conciliation agreement.
2. Send the attached letter.
3. Close the file.

Charles N. Steele
General Counsel

Dec. 19, 1945
Date

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

1. Conciliation agreement signed by respondents
2. Letter to respondents

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

L. William Troxler
1730 Glendon Avenue, Suite 11
Los Angeles, California 90024

RE: MUR 1834
Conservative Commemorative
Society, Inc., and Great
Through '88 and
L. William Troxler, as
treasurer

Dear Mr. Troxler:

On , 198 , the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. §§ 441d(a)(3), 441b, and 434(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

Att. 2

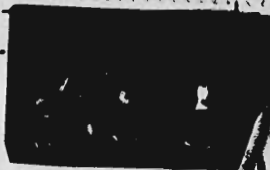
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1730 Glendon
L.A. CA. 90024



HE.
THE



Robert Raich
Office of General Counsel
Federal Elections Commission
Washington DC 20463

05 NOV 29 1985



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 1985

Mr. L. William Troxler
1730 Glendon Avenue
Suite 11
Los Angeles, California 90024

RE: MUR 1834

Dear Mr. Troxler:

This letter is to confirm that on July 29, 1985, the Commission received your suggested revisions to the conciliation agreement mailed to you on July 15, 1985. The Commission also received reports from you on August 14 and August 22, 1985. The Commission has reviewed your counterproposals and those reports and has made the following revisions to the original agreement:

The enclosed conciliation agreement is ready for your signature. Should you have any further questions, please call

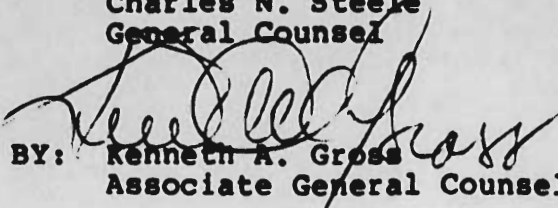
360405662

Letter to L. William Troxler
Page 2

Lois Lerner at (202) 523-4143 or (800) 424-9530. Since this is pre-probable cause conciliation, you should respond within five days.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Associate General Counsel

Enclosure
Conciliation Agreement

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MUR 1834

**Great Through '88 and
L. William Troxler, as treasurer**

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the

1. Approve and send the conciliation agreement attached to the General Counsel's report dated September 6, 1985.
2. Approve and send the letter attached to the General Counsel's report dated September 6, 1985.

Commissioners Aikens, Elliott, Josefiak, McDonald, and

Attest:

Date _____

Marjorie W. Emmons
Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Conservative Commemorative
Society, Inc.

Great Through '88 and
L. William Troxler, as Treasurer

MUR 1834

85 SEP 10 P 3: 07

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

GENERAL COUNSEL'S REPORT

SENSITIVE

BACKGROUND

The Commission instituted a compliance action and found reason to believe that the Conservative Commemorative Society, Inc. (hereinafter "Society") together with Great Through '88 and L. William Troxler, as treasurer (hereinafter "'88"), violated 2 U.S.C. 441d(a) (3) by failing to attach the required disclaimer notice to solicitations mailed on behalf of Great Through '88, a political committee registered with the Commission. The Commission also found reason to believe that the Society and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 441b by using corporate money to raise funds to be used in connection with a federal election campaign. In addition, the Commission found reason to believe that the Society and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 438(a) (4) by using reports on file with the Commission to compile a list of potential contributors and commercial contacts.* /

* / On July 3, 1985, the Commission decided to take no further action with regard to the 2 U.S.C. § 438(a) (4) reason to believe finding.

Finally, the Commission found reason to believe that Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports with the Commission.

Mr. Troxler subsequently requested conciliation prior to a probable cause to believe determination. On July 3, 1985, the Commission decided to enter into conciliation with the Society and '88 and on July 15, 1985, sent Mr. Troxler a proposed conciliation agreement.

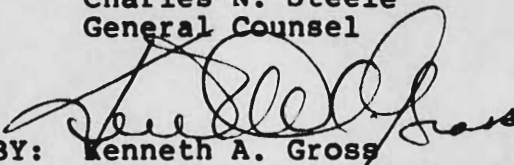
On July 22, 1985, Mr. Troxler met with members of the General Counsel's staff and suggested certain revisions to the proposed conciliation agreement.

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RECOMMENDATIONS

1. Approve and send the conciliation agreement attached to this report.
2. Approve and send the attached letter.

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Sept 6, 1985
Date

Attachments

1. Letter from Lee Troxler to Matt Gerson received July 29, 1985.
2. Great Through '88's Report of Receipts and Disbursements, et al., received by the Commission on August 14, 1985.
3. Great Through '88's amended Report of Receipts and Disbursements, et al., received by the Commission on August 22, 1985.
4. Conciliation Agreement.
5. Letter to L. William Troxler.

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Mr. Matt Gerson
Office of General Counsel
Federal Elections Commission
Washington, DC 20463

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GCC# 18133
85 JUL 29 48:36

Dear Matt,

After nearly two years of believing, truly believing in the correctness and legal propriety of my position relating to MUR 1834, and thus having time and again summarily dismissed or flippantly discounted the statutory responsibilities of the Commission, I now understand the miserable magnitude of my many and misbegotten miscalculations.

And so after long last, I do sincerely desire to formally present myself and my case before the Commission in an agreeably conciliatory fashion. I submit:

- 1) That although the activities of Conservative Commemorative Society Inc. (CCSI) and Great Through '88 (GT88) were individually and in tandem a dismal failure, causing considerable cerebral and financial anguish to all parties involved--from principals to vendors to those solicited, with the possible exception of President Reagan who unwittingly received absolutely no advantage from all this--and further causing CCSI and GT88 to have been respectively bankrupt and terminated in accordance with all applicable laws and statutes, it must be noted that never before have such an honorable cadre of well-intentioned Americans set out on such an ambitious attempt to marry art and politics to everyone's benefit.
- 2) That L. William Troxler, now living in California and making a living far-removed from the vagaries of the Capitol's uncommon existence, is certainly eager to dismiss himself and the Commission from this unfortunate case.
- 3) That in regards to violation 2 USC 441d, it should be noted that the mandatory disclaimer was distended by the print shop and overlooked during the blue-line proofing process. Please that the Commission consider the unpaid and overworked neophytes' oversight of this violation and take no action.
- 4) That in regards to GT88's failure to file regular reports as required by statute, it should be noted that the principals were negligent but predisposed however incorrectly to believing that since the PAC neither disbursed nor received any funds, it could not and should not file any reports. Please that the Commission take no action on this violation.

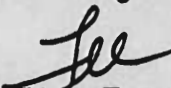
Att. 1, p.1

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GENERAL COUNSEL
15 JUL 29 410:22

5) That the principals of GTBB, in the process of establishing the PAC's business, had neither the financial resources nor the preminatory wherewithall to forestall or anticipate these legal problems, but did act in good faith in attempting to seek an Advisory Opinion. Only after the deadlines and commitments came screaming up was the opinion forgotten. And of course, the principals did believe that they were acting correctly; informal legal advise held that it was acceptable for CCSI to act as a collecting agent for GTBB in accordance with the Federal Elections Campaign Act of 1971.

Respectfully submitted,



L. William Troxler
25 July 1985

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Att. 1, p. 2

REPORT OF REPORT TO AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

ALIAS AREA ☐

STATE MASSACHUSETTS

1. Name of Committee (in Full)

GREAT THROUGH '88

Address (Number and Street)

1000 THOMAS JEFFERSON ST NW
ST. 508

City, State and ZIP Code

WASHINGTON DC 20007

☐ Check here if address is different than previously reported

2. FEC Identification Number

?

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Special election on _____ in the State of _____)
☐ Thirtieth day report following the General Election on _____ in the State of _____

☒ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period OCT. 13, 1983 through Dec 31, 1983

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

L. WILLIAM TREXLER

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

5/8/85

For further information contact

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

NOTE: Submit this report on or before the 15th day of the month following the month in which the person's filing this report. The penalties in 2 U.S.C. § 4371.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

FEC FORM 3X 13 80

Att. 2, p. 1

06040565370
R5033953700

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 281)**

Name of Committee (in Full)

Report Covering the Period

From:

To:

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-To-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

Att. 2, p. 2

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
 Line 12 (Amount)
 (Use separate schedule for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

GREAT THROUGH '88

A. Full Name, Mailing Address and ZIP Code

**CONSERVATIVE CONSTITUTIONAL SOCIETY INC
 26555 EVERGREEN AVE ST. 116
 SOUTHFIELD, MI 48076**

Name of Employer

Occupation

Date (month,
day, year)

OCT. 13, 1983

Amount of Each
Receipt This Period

**32,000.00
 IN-KIND**

Receipt For ☐ Primary ☐ General

☐ Other (specify) **CONTR. IN KIND - HEALTH INSURANCE**

Aggregate Year-to-Date-\$ **32,000.00**

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Date (month,
day, year)

Amount of Each
Receipt This Period

Receipt For ☐ Primary ☐ General

☐ Other (specify)

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL (To be filled in on page this line number only)

32,000.00

AH: L, p.3

060405653702

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 4 for
LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code CONSERVATIVE COMMUNITARIAN SOCIETY INC 26555 EVERGREEN AVE ST. 1116 SOUTHFIELD, MI 48076	Purpose of Disbursement OPERATING EXPENSES Disbursement for: ☐ Primary ☒ General ☐ Other (specify) CONT. IN KIND	Date (month, day, year) OCT 13 1988	Amount of Each Disbursement This Period 32,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL (Total Disbursements This Page, not one)			
TOTAL (Total Disbursements This Page, not one)			

Att. 2, p. 4

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Comm.

RECEIVED THE FEC

(Summary Page)

ALIGN AREA

85 AUG 22 AM 8:56

1. Name of Committee (In Full)

GREAT THROUGH '88

Address (Number and Street)

1000 THOMAS JEFFERSON ST NW
ST. 508
WASHINGTON, DC 20007

City, State and ZIP Code

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00171066

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period _____ through _____

6. (a) Cash on hand January 1, 19 _____

(b) Cash on Hand at Beginning of Reporting Period _____

(c) Total Receipts (from Line 18) _____

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28) _____

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) _____

9. Debts and Obligations Owed TO The Committee _____

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee _____

(Itemize all on Schedule C or Schedule D)

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

L. WILLIAM TROXLER

Type or Print Name of Treasurer

L. William Troxler

SIGNATURE OF TREASURER

Date

8/21/85

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3x (3/80)

Att. 3, p. 1

DETAILED SUMMARY PAGE

Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full)

GREAT THROUGH '88

Report Covering the Period

From:

To:

COLUMN A
Total This Period

COLUMN B
Calendar Year-To-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

- (a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ _____)
(b) Political Party Committees
(c) Other Political Committees
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 e(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

- (a) Individuals/Persons Other Than Political Committees
(b) Political Party Committees
(c) Other Political Committees
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

Att. 3, p. 2

SCHEDULE A

ITEMIZED RECEIPTS

Page ____ of ____ for
LINE NUMBER ____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full) GREAT THROUGH '88			
A. Full Name, Mailing Address and ZIP Code CONSERVATIVE CONMEMORATIVE SOCIETY INC.		Name of Employer Occupation	Date (month, day, year) OCT 13, 1983 Amount of Each Receipt this Period 32,223.49 (IN-KIND)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
B. Full Name, Mailing Address and ZIP Code METROLABELS INC.		Name of Employer DIRECT MAIL Occupation	Date (month, day, year) Amount of Each Receipt This Period 22,523.49 (MEMO ENTRY)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
C. Full Name, Mailing Address and ZIP Code DUNHILL LISTS INC.		Name of Employer MAILING LISTS Occupation	Date (month, day, year) Amount of Each Receipt This Period 4,700.00 (MEMO ENTRY)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code PROUD TRADITIONS LTD		Name of Employer PRODUCTION of SCULPTURE Occupation	Date (month, day, year) Amount of Each Receipt This Period 5,000.00 (MEMO ENTRY)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year) Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year) Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year) Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			Att. 3, p. 3

3
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3

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ____ of ____ for
 LINE NUMBER ____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

GREAT THROUGH '88

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>CONSERVATIVE COMMEMORATIVE SOCIETY INC.</i>	<i>FUND RAISING</i> Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	<i>OCT. 13, 1983</i>	<i>32,223.49</i>
<i>SEE SCHED. E</i>	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period <i>(16,111.75)</i>
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			<i>16,111.75</i>

Att. 3, p. 4

106040565377

ITEMIZED INDEPENDENT EXPENDITURES

Page _____ of _____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)				I.D. No.	
GREAT THROUGH '88					
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
CONSERVATIVE COMMEMORATIVE SOCIETY INC.	MAILING	10/13/83	16,111.75-	RONALD REAGAN ☒ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
				☐ Support ☐ Oppose	
(a) SUBTOTAL of Itemized Independent Expenditures			\$		
(b) SUBTOTAL of Unitemized Independent Expenditures			\$		
(c) TOTAL Independent Expenditures			\$		

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature

Date

Subscribed and sworn to before me this 21 day of August, 1985

My Commission expires

7-25-87

NOTARY PUBLIC



OFFICIAL SEAL
MARIE CARI
NOTARY PUBLIC - CALIFORNIA
LOS ANGELES COUNTY
My comm. expires JUL 25, 1987

Att. 3, p.5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. L. William Troxler
1730 Glendon Avenue
Suite 11
Los Angeles, California 90024

RE: MUR 1834

Dear Mr. Troxler:

This letter is to confirm that on July 29, 1985, the Commission received your suggested revisions to the conciliation agreement mailed to you on July 15, 1985. The Commission also received reports from you on August 14 and August 22, 1985. The Commission has reviewed your counterproposals and those reports and has made the following revisions to the original agreement:

The enclosed conciliation agreement is ready for your signature. Should you have any further questions, please call

Att. 5, p.1

3604056537

Letter to L. William Troxler
Page 2

Lois Lerner at (202) 523-4143 or (800) 424-9530. Since this is pre-probable cause conciliation, you should respond within five days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

18604055330

Att. 5, p. 2

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
Conservative Commemorative)
Society, Inc.)
)
Great Through '88 and)
L. William Troxler, as treasurer)

MUR 1834 85 AUG 14 A9:13

SENSITIVE

GENERAL COUNSEL'S REPORT

I. Background

L. William Troxler set up the Conservative Commemorative Society, Inc. ("Society") to coordinate, finance, and market a project to raise funds for Great Through '88 ("88"), a political committee registered with the Commission. Thereafter, the Commission found reason to believe that the Society and '88 and Mr. Troxler, as treasurer, violated 2 U.S.C. §§ 441d(a)(3), 441b, and 438(a)(4). The Commission also found reason to believe that '88 and Mr. Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4).

On July 3, 1985, the Commission decided to enter into conciliation with the respondents.* / On July 22, 1985, Mr. Troxler met with members of the General Counsel's staff and on July 29, 1985 the General Counsel received a letter containing recommendations for changes to the conciliation agreement.

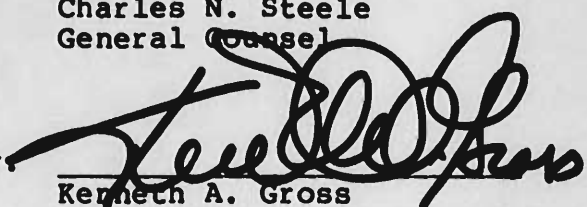
* / On July 3, the Commission also decided to take no further action with regard to the 2 U.S.C. § 438(a)(4) reason to believe finding.

Mr. Troxler and this Office are continuing their efforts to reach a viable conciliation agreement. This Office believes it is worthwhile to continue these pre-probable cause to believe negotiations for an additional thirty (30) days.

Charles N. Steele
General Counsel

August 9, 1965
Date

By:


Kenneth A. Gross
Associate General Counsel

86040565332

Mr. Matt Gerson
Office of General Counsel
Federal Elections Commission
Washington, DC 20463

RECEIVED AT THE FEC
GCC# 18133
85 JUL 20 48: 06

Dear Matt,

After nearly two years of believing, truly believing in the correctness and legal propriety of my position relating to MUR 1834, and thus having time and again summarily dismissed or flippantly discounted the statutory responsibilities of the Commission, I now understand the miserable magnitude of my many and misbegotten miscalculations.

And so after long last, I do sincerely desire to formally present myself and my case before the Commission in an agreeably conciliatory fashion. I submit:

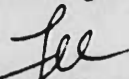
- 1) That although the activities of Conservative Commemorative Society Inc. (CCSI) and Great Through '88 (GT88) were individually and in tandem a dismal failure, causing considerable cerebral and financial anguish to all parties involved--from principals to vendors to those solicited, with the possible exception of President Reagan who unwittingly received absolutely no advantage from all this--and further causing CCSI and GT88 to have been respectively bankrupt and terminated in accordance with all applicable laws and statutes, it must be noted that never before have such an honorable cadre of well-intentioned Americans set out on such an ambitious attempt to marry art and politics to everyone's benefit.
- 2) That L. William Troxler, now living in California and making a living far-removed from the vagaries of the Capitol's uncommon existence, is certainly eager to dismiss himself and the Commission from this unfortunate case.
- 3) That in regards to violation 2 USC 5441d, it should be noted that the mandatory disclaimer was distended by the print shop and overlooked during the blue-line proofing process. Please that the Commission consider the unpaid and overworked neophytes' oversight of this violation and take no action.
- 4) That in regards to GT88's failure to file regular reports as required by statute, it should be noted that the principals were negligent but predisposed however incorrectly to believing that since the PAC neither disbursed nor received any funds, it could not and should not file any reports. Please that the Commission take no action on this violation.

RECEIVED
OFFICE OF
GENERAL COUNSEL
15 JUL 20 48: 22

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5) That the principals of GT88, in the process of establishing the PAC's business, had neither the financial resources nor the preminatory wherewithall to forestall or anticipate these legal problems, but did act in good faith in attempting to seek an Advisory Opinion. Only after the deadlines and commitments came screaming up was the opinion forgotten. And of course, the principals did believe that they were acting correctly; informal legal advise held that it was acceptable for CCSI to act as a collecting agent for GT88 in accordance with the Federal Elections Campaign Act of 1971.

Respectfully submitted,



L. William Troxler
25 July 1985

3 6 0 4 0 5 6 5 3 3 4

JAM TROXLER
LENDAL AVE #11
LOS ANGELES, CA 90024

86040565303



MR. MATT GERSON
OFFICE of GENERAL COUNSEL
FEDERAL ELECTIONS COMMISSION
WASHINGTON, DC 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 15, 1985

Mr. L. William Troxler
1730 Glendon Avenue
Suite 11
Los Angeles, California 90024

RE: MUR 1834

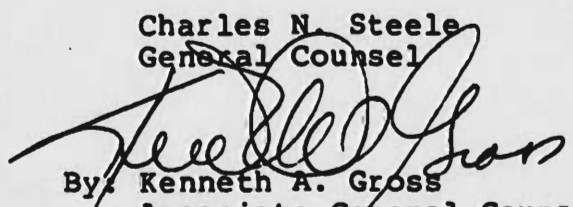
Dear Mr. Troxler:

On October 23, 1984, the Commission found reason to believe that Great Through '88 and you, as treasurer, and the Conservative Commemorative Society violated 2 U.S.C. §§ 438(a)(8), 441b, and 441d(a)(3). The Commission also found reason to believe that Great Through '88 and you, as treasurer, violated 2 U.S.C. § 434(a)(4). At your request, the Commission determined on July 3, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. At that time the Commission decided to take no further action with regard to the 2 U.S.C. § 438(a)(4) violation.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Matt Gerson, the attorney assigned to this matter, at (202) 523-4143 or (800) 424-9530.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Conservative Commemorative) MUR 1834
Society, Inc.)
Great Through '88 and)
L. William Troxler, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1834:

1. Enter into conciliation with the Conservative Commemorative Society, Inc., as well as Great Through '88 and L. William Troxler, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the proposed conciliation agreement attached to the General Counsel's Report signed June 27, 1985.
3. Take no further action against the Conservative Commemorative Society, Inc., as well as Great Through '88 and L. William Troxler, as treasurer, with regard to the 2 U.S.C. § 438(a)(4) reason to believe finding.

(Continued)

8604055387

MUR 1834
Certification
General Counsel's Report
Signed June 27, 1985

Page 2

4. Approve and send the letter attached to the General Counsel's Report signed June 27, 1985.

Commissioners Aikens, Elliott, Harris, McDonald,
McGarry and Reiche voted affirmatively in this matter.

Attest:

7-5-85

Date

Jody C. Renson
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

7-1-85, 11:06
7-1-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Conservative Commemorative)
Society, Inc.)

MUR 1834

Great Through '88 and)
L. William Troxler, as Treasurer)

GENERAL COUNSEL'S REPORT

SENSITIVE

BACKGROUND

On October 23, 1984, the Commission instituted a compliance action and found reason to believe that the Conservative Commemorative Society, Inc. (hereinafter "Society") together with Great Through '88 and L. William Troxler, as treasurer (hereinafter "'88"), violated 2 U.S.C. 441d(a)(3) by failing to attach the required disclaimer notice to solicitations mailed on behalf of Great Through '88, a political committee registered with the Commission. The Commission also found reason to believe that the Society and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 441b by using corporate money to raise funds to be used in connection with a federal election campaign. In addition, the Commission found reason to believe that the Society and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 438(a)(4) by using reports on file with the Commisison to compile a list of potential contributors and commercial contacts.

Finally, the Commission found reason to believe that Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports with the Commission.

On October 26, 1984, the Commission sent Mr. Troxler a letter notifying him of these findings. That letter included a list of questions. See Attachment 1. On November 13, 1984, this Office received from Mr. Troxler a letter that addressed the Commission's findings as well as this Office's questions. Mr. Troxler's answers were generally unresponsive. See Attachment 2.

On March 19, 1985, the Commission issued a Subpoena and Order for the Production of Documents to Mr. Troxler. See Attachment 3. Mr. Troxler contends that he did not receive the Subpoena and Order in a timely fashion because he had moved from Washington, D.C. to Los Angeles, California. On April 29, 1985, Mr. Troxler responded to the Subpoena and Order. See Attachment 4. Thereafter, this Office and Mr. Troxler engaged in telephone conversations that resulted in Mr. Troxler's May 10, 1985 request for pre-probable cause to believe conciliation. See Attachment 5.

FACTUAL AND LEGAL ANALYSIS

It appears that Mr. Troxler set up the Society, a Michigan corporation, solely to coordinate, finance, and market a project to raise funds for Great Through '88, a political committee registered with the Commission. See Attachment 6. Mr. Troxler is '88's treasurer. According to Mr. Troxler, the marketing project was unsuccessful and both the Society and '88 disbanded

in June 1984. See Attachment 2, p. 2 and Attachment 4.^{1/} It is noteworthy that Mr. Troxler was a principal in both entities.

1. Failure to Place a Disclaimer on a Direct Mail Solicitation

The Society utilized direct mailings that solicited contributions to Great Through '88 and advocated Ronald Reagan's reelection. Specifically, the Society attempted to sell coins and sculptures and claimed that:

[a]ll proceeds above the established market value of the collection will go toward reelecting Ronald Reagan and conservative candidates who support the themes of the Reagan presidency. See Attachment 6.

Another mailer stated:

P.S.- Remember, proceeds go toward making Ronald Reagan the first successful two-term President since... Eisenhower. See Attachment 4, p. 3(a).

These direct mail solicitations did not contain a disclaimer statement. 2 U.S.C. § 441d(a)(3) states:

Whenever a person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any direct mailing,... such communication... shall clearly state the name of the person who paid for the communication.

^{1/} Mr. Troxler's April 29, 1985 response to the March 19, 1985 Subpoena and Order states:

[The Society] never came close to covering expenses and [the Society] went bankrupt trying to meet its financial obligations. So, ['88] never received any payments from [the Society]. See Attachment 4, p.1.

The term "person" includes corporations. 2 U.S.C. § 431(11).

Mr. Troxler's April 28, 1985 answer to the Commission's Subpoena and Order explains at #3.

[The Society's] principals were direct mail neophytes trying to reelect President Reagan. They didn't even know they were violating 441d(a)(3). Had a second mailing been possible, they would have corrected the error. They experienced a veritable slew of problems, have learned their lessons the hard way, and look forward to concluding this matter swiftly. See Attachment 4, p.1.

The Society and Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 441d.

2. Compiling a Mailing List from Information on the Public Record

One of the direct mail pieces noted that the solicitees demonstrated (their commitment to America and President Reagan) by contributing to Ronald Reagan's first campaign. See Attachment 4, p. 3.

That statement caused the Commission to find reason to believe that the Respondents compiled a list of potential contributors and commercial contacts from information on the Commission's public records. 2 U.S.C. § 438(a)(4).

The Commission's October 26, 1984 Questions to Mr. Troxler asked him how he compiled the list of persons to solicit. See Attachment 1. It also asked for the original source of the list. In response, Mr. Troxler provided a chart of the 13 different commercial lists containing some 170,000 names. See Attachment 2. He also provided a photocopy of a mailing list order confirmation from Dunhill of Washington, the representative for Dunhill International List Co., Inc. See Attachment 4.

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The nature of the mailing list industry renders it possible that the lists were "guaranteed" to include only donors with a propensity to contribute to seemingly conservative causes. In preparing the solicitation, it would have been reasonable for Mr. Troxler to have presumed that those on the lists contributed to the President's 1980 campaign. Thus, it is reasonable for the direct mail pieces to have stated that the solicitees "demonstrated (their commitment to America and President Reagan) by contributing to Ronald Reagan's first campaign." Accordingly, it is this Office's opinion that the Commission should take no further action against the Respondents with regard to the 2 U.S.C. § 438(a)(4) reason to believe findings. 2/

3. Corporate Funds Used In Connection With A Federal Campaign

The Society is a Michigan corporation that appears to have been established to coordinate, finance, and market a project to raise funds for '88. There is no indication that the Society ever had any other business function. Mr. Troxler supplied documents indicating that the Society advanced at least \$32,223.49 on the project. 3/

2/ The Justice Department referred this case to the Commission after the Society sent a direct mail solicitation to Fred Fielding at his place of federal employment. See 18 U.S.C. §607. Mr. Troxler's April 29, 1985 response notes that:

The mailing house accidentally included my list of friends and associates on the master mailing list. Since I served honorably in the White House for a while, some government names were mailed without the prior knowledge or consent of [the Society]. Att. 4, p. 1.

3/ One document states that the Society advanced \$22,523.49 to Metrolabels, Inc, a mass mailing house, to "stuff, stamp, seal, sort, tie, bag and mail ... 105,000 pieces." Att. 4, pp. 8-10.

Other documents indicate that the Society paid \$4,700 to Dunhill lists of Washington. Att. 4, pp. 13, 14, 15 and 22.

The corporate funds used to coordinate, finance and market the project were in-kind contributions that solicited contributions to an unconnected political committee and advocated Mr. Reagan's reelection. Thus, corporate funds were unlawfully used in connection with a federal campaign. See 2 U.S.C. § 441b.

4. Failure to File Reports With the Commission.

Great Through '88 never filed reports with the Commission subsequent to its October 13, 1983 registration.

In Mr. Troxler's April 29, 1985 response to the Subpoena and Order, he explains that the Society went bankrupt and, as a result, '88 never received any payments. Thus, '88 never established a bank account and never filed any reports.

During telephone conversations between this Office and Mr. Troxler, Mr. Troxler agreed to file the delinquent reports. In his letter requesting conciliation dated May 10, he states:

I am also filing under separate cover... all my tardy PAC reports.

In a letter received by the Commission on May 29, 1985, Mr. Troxler states:

Please be advised that... Great Through '88 has never filed the appropriate reporting forms, has not received nor disbursed any funds, and is not functioning any longer. See Attachment 7.

3/ Cont'd

Another receipt indicates that the Society paid \$5,000 to Proud Tradition, Ltd., the sculpture's producer. Att. 4, p.24.

Mr. Troxler provided other invoices but it is unclear whether the Society made payments against those invoices.

Had '88 never received or disbursed funds and remained under the \$1,000 threshold, this explanation may have been satisfactory as the Committee would have had no reporting requirements. However, as discussed at #3 above, it appears that '88 received substantial in-kind contributions from the Society. '88 was obligated to report the contributions discussed at #3 above and '88 continues to have reporting requirements.

THE PROPOSED CONCILIATION AGREEMENT

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RECOMMENDATIONS

1. Enter into conciliation with the Conservative Commemorative Society, Inc., as well as Great Through '88 and L. William Troxler, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the attached proposed conciliation agreement.
3. Take no further action against the Conservative Commemorative Society, Inc., as well as Great Through '88 and L. William Troxler, as treasurer, with regard to the 2 U.S.C. § 438(a)(4) reason to believe finding.
4. Approve and send the attached letter.

Charles N. Steele
General Counsel

Date

June 27, 1985

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. October 26, 1984 questions to L. William Troxler from the Commission.
2. Letter from L. William Troxler to Conley Edwards, Jr. received November 13, 1984.
3. March 19, 1985, Subpoena and Order for the Production of Documents issued to L. William Troxler.
4. Letter from L. William Troxler to Matt Gerson received April 29, 1985.
5. Letter from L. William Troxler to Matt Gerson received May 16, 1985.
6. News Release issued January 12, 1983 by the Conservative Commemorative Society.
7. Letter from L. William Troxler as Great Through '88's Secretary received May 29, 1985.
8. Proposed Conciliation Agreement.
9. Letter to Respondent.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. L. William Troxler
1730 Glendon Avenue
Suite 11
Los Angeles, California 90024

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Commission found reason to believe that Great Through '88 and you, as treasurer, and the Conservative Commemorative Society violated 2 U.S.C. §§ 438(a)(8), 441b, and 441d(a)(3). The Commission also found reason to believe that Great Through '88 and you, as treasurer, violated 2 U.S.C. § 434(a)(4). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. At that time the Commission decided to take no further action with regard to the 2 U.S.C. § 438(a)(8) violation.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Matt Gerson, the attorney assigned to this matter, at (202) 523-4040 or (800) 424-9530.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

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QUESTIONS FOR L. WILLIAM TROXLER, TREASURER
GREAT THROUGH '88

1. What positions do you hold in the two (2) following entities:
 - a. Great Through '88
 - b. The Conservative Commemorative Society, Inc.
2. Are any of the above paid positions?
3. Is the Society a registered corporation? If so,
 - a. what state;
 - b. date of incorporation.
4. What is the stated legal purpose of the Society?
 - a. Please provide the Articles of Incorporation.
5. Please name and identify all officers of the Society.
6. Please name and identify all officers of Great Through '88.
7. What is the nature of the stated agency relationship between Great Through '88 and the Society?
8. Please provide copies of any contracts, agreements or other documents that explain the relationship referred to above.
9. Is Great Through '88 directly or indirectly established or maintained by a corporate entity? If so, identify the corporation.
10. What is the source of the funds that will be used to purchase the commemorative items?

Attachment I

Questions for L. William Troxler
Page 2

11. Who will purchase the commemorative items?
12. How did you compile your list of persons to solicit? Please state the original source of your list.
13. How will Great Through '88 receive the funds that will finance it?
14. What portion of the proceeds will be kept by the Society as commission, expenses, and/or profit?
15. Will Great Through '88 and the Society share the same bank accounts?
16. Please name the bank(s), credit union(s), and/or any other banking or financial institutions that will be used as depositories by Great Through '88 and the Society.
17. Are there any funds presently in the accounts established by Great Through '88 and the Society?

I, p.2

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L. William Troxler

ATTENTION: Conley Edwards, Jr.
RE: MUR1834

October 31, 1984

First thing we do, let's kill all the lawyers.

Shakespeare, Henry VI

Geezzus guys, what have you been smoking down there. I get this letter from my (?) government (?) in the mail, and like any good God fearing, tax-paying, salt-of-the-earth American, I try to take it seriously. But how can I?

Even if I did understand it--which I don't, and even if I had anything to hide--which I now don't know if I do or not, how could I take it seriously? Did anybody there read what you wrote? But alas, I trust you are trying to do your job, and since my tax-dollars are paying your salary, I will try to be helpful.

Do keep this confidential, I wouldn't want my mother to read about my misfortunes and, er, wrongdoings in the tabloids. I'm plunging ahead without the services of a lawyer. So, please humor me if my "responses" aren't as pettifogging and peremptorily pious as your "questions."

I am but a humble American (though less humble than young Tom Paine when he wrote to beg the forgiveness of the Crown for those crimes he perpetrated as tax collector). And I do understand, as Tom did, that it would be simple enough, though expensive, to ignore your questions. Nonetheless, I humbly submit, on Page Two, my answers to your questions.

Respectfully,
J. William Troxler

1549 35th Street, N.W., Suite One
Washington, D.C. 20007

Attachment II

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34 NOV 13 11:51
GENERAL COUNCIL

Responses by L. William Troxler to
Questions for L. William Troxler from
Somebody at the Federal Elections Commission
On behalf of Chairman Lee Ann Elliott,
Honorable I presume

- 96040565401
- 1a. I registered Great Through '88 but never conducted any business, and disbanded in June, 1984.
 - 1b. I was President of The Conservative Commemorative Society, Inc., also disbanded in June, 1984.
 2. Both were done in honor to country, no compensation received. Hard to believe? Well, folk like me do exist out there.
 - 3a. Michigan.
 - 3b. August 29, 1983
 4. To produce political commemorative keepsakes.
 - 4a. Attached.
 5. See Articles of Incorporation, still attached.
 6. Just me, folks.
 7. All proceeds from the sales of the commemoratives by the Society were to go to Great Through '88.
 8. Everything verbal, no lawyers, just trust.
 9. Nope. Not directly. Not indirectly.
 10. Money with imprint, "In God We Trust."
 11. Customers who trust in God and country.

Page Three

12. Made up the names myself. Okay, okay, here is the list:

<u>Company</u>	<u>List Title</u>	<u>Count</u>
EPACO	Best Conservatives	10,000
Response Dynamics	Americans for Reagan Agenda	10,000
Ultra Arts	National Review Subscribers	10,000
Rubin Response	CFTR Doners	50,000
Fred Woolf Lists	Lobbyists	8,000
Jami Lists	Coin Country Subscribers	5,000
Jami Lists	American Collector Subsc.	5,000
Dunhill Lists	Doctors	10,000
James Jorg Lists	Medallic Art Inc. Customers	43,936
Thompson Assoc.	Human Events Subscribers	5,000
Thompson Assoc.	FCM Doners	4,000
Thompson Assoc.	Thompson House File	4,000
Thompson Assoc.	Campaign '82 High-doners	5,000

13. It will not.

14. None, Society achieved negative cash flow, comprende?

15. Nope.

16. Great Through '88 has no banking account, never did, and sadly, never will. Society has an account at Michigan National Bank-Oakland.

17. None, obviously, in Great Through '88's non-existent account; negative balance in Society's.

P.S. Can I bill you for my time on this? Oh well, how 'bout them election results!

Attachment II (p-3)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The Conservative Commemorative
Society, Inc.

L. William Troxler, Director
Great Through '88

L. William Troxler, Treasurer

)
)
) MUR 1834
)
)
)
)
)

SUBPOENA AND ORDER FOR THE
PRODUCTION OF DOCUMENTS

To: L. William Troxler, Director
The Conservative Commemorative Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

8 6 0 4 0 5 6 5 4 0 3
PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas certain books, records, memoranda and other written materials in your possession which pertain to commercial transactions of the Conservative Commemorative Society, Inc. that may relate to the establishment and operation of Great Through '88.

You are hereby ordered to provide the following:

1. All originals, or duplicate and complete copies, of all direct mail, magazine and other solicitations utilized by the Conservative Commemorative Society, Inc., in its effort to sell the Great Eagle Medallion Sculpture.
2. All documents and materials concerning the purchase of each mailing list referred to by L. William Troxler at page three, number 12 of his October 31, 1984 response to the Commission.

Attachment III

3. All documents and materials concerning any other list of persons solicited by the Commemorative Society, Inc. and specifically identifying the list which contained the following addressee:

Fred Fielding
W.H.O.
2nd Floor
Executive Office of the President
Washington, D.C.

4. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed by the Conservative Commemorative Society, Inc. with the Medallie Art Company of Connecticut, the purported manufacturer of the Great Eagle Medallie Sculpture.
5. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed with the Conservative Commemorative Society, Inc. by individuals or entities interested in purchasing the Great Eagle Medallie Sculptures.
6. All the Reports of Receipts and Disbursements that Great Through '88 filed pursuant to 2 U.S.C. § 434(a)(4), if these reports exist.

Definitions

As used in this Subpoena and Order, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is

III, p.2

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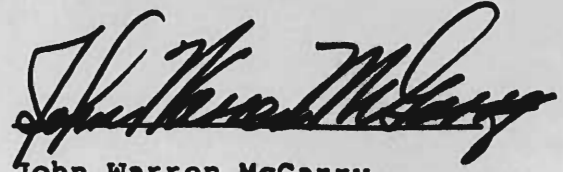
transmitted or stored including the original, all copies, and drafts of writings of any kind, and printed, visual, or electronic materials to be produced with regard to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, related to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from October 14, 1983, up to and including December 31, 1984, unless otherwise specified.
4. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

III, p.3

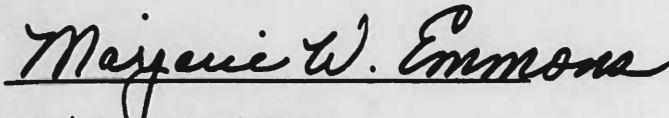
WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 19th day
of March 1985.



John Warren McGarry

Chairman

ATTEST:



Marjorie W. Emmons

Secretary to the Commission

III, p.4

86040565406

ATTENTION: Matt Gerson
FROM: L. William Troxler
RE: MUR 1834

66673/2 THE FEB

85 APR 29 PM 1: 51

20 P 3: 15
Welcome to my case! Since I am providing you with all the information you ask for, please allow me the courtesy of one question. Can I bill the government for all the expenses incurred in this investigation after you drop all charges because you have no case?

I'm curious, because I will spend into the triple digits soon, and I cannot afford it. Actually, I have two questions. Couldn't you tell from my October 31, 1984 letter that I am either insane or innocent? Neither can be punished!

And of course, I have a few requests: please return all attached materials and hold all items confidential. And permit me to shed some light on this very unfortunate matter. CCS Inc. principals were direct mail neophytes trying to help reelect President Reagan. They didn't even know they were violating 44ld(a)(3). Had a second mailing been possible, they would have corrected the error. They experienced a veritable slew of problems, have learned their lessons the hard way, and look forward to concluding this matter swiftly.

RESPONSES TO SUBPOENA ORDER

1. Documents attached.
2. Documents attached.
3. The mailing house accidentally included my list of friends and associates on the master mailing file. Since I served honorably in the White House for awhile, some government names were mailed without the prior knowledge or consent of CCS Inc. My personal list is not organized for review, but if you ask, I'll go through my Rolodex.
4. Attached are all CCS Inc. order forms. The Great Eagle Medallion Sculpture was carved by Edward Fraughton, the medallions were produced by Medallic Art Company, the sculptures were produced by Proud Traditions Ltd.
5. CCS Inc. never came close to covering expenses, and then CCS Inc. went bankrupt trying to meet its financial obligations. So, Great Through '88 never received any payments from CCS Inc. Thus, no bank account was ever established, and no reports were ever filed.

Attachment IV,
p.1

86040565407

The ^{FEC: ad in National Review} Great Eagle Medallion Sculpture

The American Eagle Sculpture, and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.

The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

Six Ways The Great Eagle Medallion Sculpture Will Delight the Connoisseur

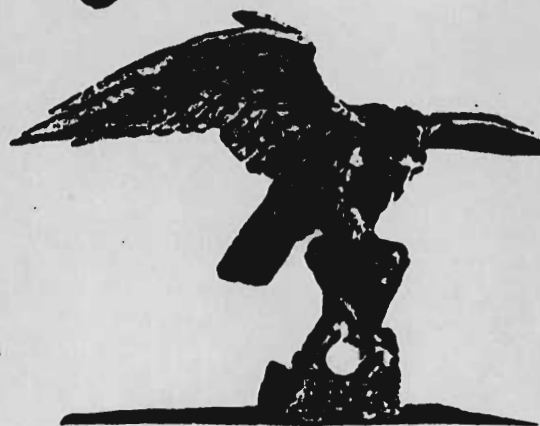
An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions

REQUEST DETAILS

PHONE ORDERS: It's the easiest way to order. Just pick up the phone and call toll free during business hours — 800 435-4484. In Illinois, call 800 892-6990 Ext 264. Thank you for only making credit card orders over the phone. Our customer service representative will be happy to answer your questions and take your suggestions.

	Each
• Great Eagle Sculpture	\$1050
• GOP Elephant Sculpture	650
• Gold medallion	950
• Silver medallion	95
• Bronze medallion	35

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.



*An Exceptional Precedent
in Commemorative Art*



The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.



OFFICIAL SPECIFICATIONS: By arrangement with the Conservative Commemorative Society, gold and silver medallions are strictly limited, serially numbered, and authenticated. These high-relief medallions include a protective display case. The 14KT gold art medal is 1 1/2" in diameter and contains approximately 1 1/2 troy ounces of gold. Gold edition limit: 500. The silver art medal is .999 fine, also 1 1/2", and contains approximately 1 1/4 troy ounces of silver. Silver edition limit: 1500. The bronze is 2 3/4", hand rubbed to a rich antique patina. The sculptures are hand-carved in America from solid mahogany. The Great Eagle is 18" tall, with a 24" wingspan. The GOP Elephant is 9" high and 11" long. Sculpture edition limit: 1,000 of each.

FEC:
direct mail
to "political select"



*In Honor of
the Great Eagles
of American Society*

Mrs W M Mitchell
PO Box 26 Cruz Bay
St John, VI 00830

Dear Mrs Mitchell,

The greatest country in the history of the world is the United States today. Family. Liberty. Prosperity.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great.

In Your honor, *Great Through '88* has now authorized the historic Great Eagle Medallion Sculpture collection -- as a tribute to you.

Let me explain.

We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign. And we wish to celebrate your role as a guiding force in the American society of tomorrow.

Our on-going conservative presidential leadership offers the greatest promise for our future. President Reagan, speaking to his executive staff on January 20, 1983, said it best:

"We were sent here to move America forward again by putting people back in charge of their own country...to give individuals the opportunities to reach for their dreams."

Those of us listening to the President at that meeting were inspired to form *Great Through '88*, so that we all could contribute our most, and best, again. Along with the Conservative Commemorative Society, we've launched an ambitious and long-overdue undertaking.

We have authorized a unique collection of high-relief art medallions presented on hand carved mahogany sculptures -- as a tribute to you and to President Reagan.

Congratulations Great Eagle!

IV, p.3

009075410

In case you're curious, the idea for the collection was born from Ronald Reagan's love of the outdoors as a woodsman.

Your official Medal of Honor is offered in 14-karat gold, fine silver, or bronze -- your choice. It is minted by Medallie Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the Medal of Honor are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4484 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the foot of the sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,

L. Wille Vexler

L. William Troxler
Director

IV, p. 3 (a)

P.S. Remember, proceeds go toward making Ronald Reagan the first successful two-term President since Dwight D. Eisenhower. Remember too, order by January 20th for a personalized edition and complimentary books.



*In Honor of
the Great Eagles
of American Society*

FEC:
direct mail
"collector" select

Dear American,

The greatest country in the history of the world is the United States today.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great

Now, *Great Through '88* has authorized the Great Eagle Medallion Sculpture collection -- an historic investment opportunity for you.

Let me explain.

Great Through '88, a political organization deeply committed to America and on-going conservative leadership, wishes to celebrate your role as a guiding force in the American society of tomorrow.

What kind of society will it be?

- * America moves forward again by putting people back in charge of their own country;
- * The size and power of government is limited to allow for private growth;
- * Individuals are given the opportunity to reach for their dreams;
- * Ideals of family, liberty and prosperity are strengthened.

This is the America *Great Through '88* is proudly working for.

By arrangement with the Conservative Commemorative Society, we have authorized a limited edition collection of high-relief art medallions presented on hand carved mahogany sculptures. These are exceptional works of commemorative art.

So, for you they are a fine investment. For America, they represent the greatest promise for the future. That's because all proceeds from the limited issue will go to support conservative candidates in the 1984 elections. Therefore, contributions may qualify for a tax credit.

The enclosed brochure illustrates the collection in detail. Here is a summary:

- An Investment of Value-
- World Famous Craftsmanship-
- Unique, Exclusive Significance-
- Strictly Limited Editions-
- Unconditional Guarantee-

The centerpiece of it all is the Great Eagle Medallion Sculpture. The acronym, GEMS, is really quite fitting -- for they are superb gems.

The first-issue collector Medallions are offered in 14-karat gold, fine silver, or bronze -- your choice. They are minted by Medallie Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the medallions are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

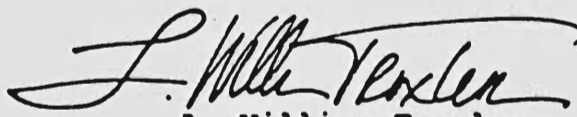
To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4484 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the base of the sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,


L. William Troxler
Director

P.S. This is not only an exceptional investment opportunity for you, it helps ensure that America will be Great Through '88.

IV, p. 4(a)

REQUEST FORM

The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.

	Each	Quantity	Sub-Total
* Great Eagle Sculpture	\$1050	_____	_____
* GOP Elephant Sculpture	650	_____	_____
* Gold medallion	950	_____	_____
* Silver medallion	95	_____	_____
* Bronze medallion	35	_____	_____
TOTALS			=====

Complementary Gifts:

_____ *A Time for Choosing*

_____ *Along Wit's Trail*

_____ Both. I requested several commemoratives for the January 20th signing

_____ Additional books are available on request

So that we may personalize your commemorative correctly, please write the name clearly:

Make checks payable to:

Conservative Commemorative Society

I enclose my check for \$_____

Charge my account instead: ☐ VISA
 ☐ MASTERCARD

Account # _____ Exp. Date _____

Name _____

Address _____

City _____ State _____ Zip _____

Signature _____

(Not valid unless signed)

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A Tribute To America's Great Eagles

From Great Through '88



Your Official Medal of Honor ...

Offered in 14-karat gold, fine silver, or bronze — your choice.

The obverse features a high-relief portrait of the President and his First Lady, in formal attire. This is a first, an unprecedented collectors' item with extraordinary numismatic importance. Soaring with the first couple is the Great Eagle, representing those citizens who are helping to make America great again.

The reverse features the Great Eagle in majestic flight clutching the scroll "Family, Liberty, Prosperity." The special significance of these words is explained to the right.

The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

... And Its Impressive Display

These are hand carved and beautifully detailed solid mahogany sculptures. They recreate the old-fashioned elegance of America's great heritage.

The American Eagle Sculpture, and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor, known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.



Chiseled into the heartwood of the finely crafted sculpture is an inspirational message on conservatism:

*Our determined quest
For eternal truths
Keeps America
Great through the years*

Along with this tome, your name or preference can be carved into the base, and dated January 20, 1984, so that we may begin our fourth anniversary together. Signed by Fraughton at a special January 20th ceremony, your commemorative keepsake is complete.

The Great American Eagle has been authorized as the official emblem of these commemoratives for the grandest of reasons:

Family

No other creature so genuinely reflects love of family as the American Eagle, building a new and better nest on top of the old, year after year. Our Eagle spends more care in the education of its young than any other in our skies and is faithful through the years.

Liberty

On our Great Seal since 1782, the American Eagle is proud freedom symbolized. He is the absolute master of flight, found gliding 10,000 feet above the earth.

Prosperity

Capable of detecting a fish three miles away, our American Eagle can capture it in one long, slanting dive. With his power, the American Eagle prospers in all the continental United States and Alaska.

You, the Great Eagle of our society, are the embodiment of Family, Liberty, Prosperity. We know you will cherish your magnificently patriotic Great Eagle Medallion Sculpture.

**Six Ways The
Great Eagle Medallion Sculpture
Will Delight the Connoisseur**

**An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions**

dunhill of washington
representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

October 21, 1983

Philip B. Fischer
26555 Evergreen, Suite 1116
Southfield, MI 48076

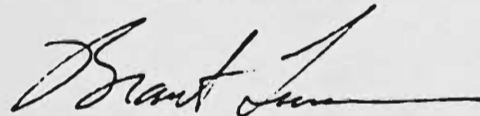
Dear Mr. Fischer,

As you know I am handling the mailing list orders for Lee Troxler's project. Enclosed please find copies of the list orders that were sent out on Friday October 21. These order forms indicate the prices for each list as a price per thousand names. The following is an itemized estimate of the lists costs. As a list broker I am required to have the list costs in advance and to guarantee payment to each supplier. Please forward a check payable to Dunhill of Washington for the amount indicated below as soon as possible.

List Name	Quantity	Price Per Thousand	Total
CFTR	50,000	45.00	\$2,250.00
ARA	10,000	10.00	100.00
National Review	10,000	100.00	1,000.00
Doctors @ Home	10,000	45.00	450.00
EPACO's Cons.	10,000	75.00	750.00
Medalic Art	43,936	10.00 est.	100.00
Lobbyist	8,000	45.00	360.00
Coin Country	10,000	55.00	550.00
American Collector	10,000	55.00	550.00
Estimated Shipping and Handling			
Via Air Express Both Ways			\$ 200.00
TOTAL			\$6,310.00

Thanks for your timely assistance in this matter.

Sincerely,



Brant Turner
Director of Sales

IV, p. 7

FEC #2
Vendor for
mail lists &
name of mailing house.
I don't have list of 130K
names mailed by House.

96040565415

See- as your requested

METROLABELS, INC.
512 Maple Avenue, West
Vienna, Virginia 22180

December 26, 1983

Mr. Lee Troxler
1000 Thomas Jefferson Street
Suite 508
Washington, DC 20007

Dear Mr. Troxler,

Metrolabels is pleased to offer you this proposal. We appreciate your assistance in stating your requirements so clearly.

The tasks involved are the following:

1. Metrolabels will have 51,500 #10 standard window and 27,500 #10 regular envelopes printed in one color (gold ink). Metrolabels will also have 113,500 #5 bills printed in black ink.
2. Metrolabels will also have 24,500 8-1/2" x 11" letters printed on 50# white off-set paper with three colors (gold, navy, and black) printed on the front side and two colors (black and navy) printed on the reverse.
3. Metrolabels will have 32,000 8-1/2" x 11" letters on 24# white Hammermill Bond printed with two colors (navy and black) offset printed on the back side and two colors (navy and gold) offset printed on the front side. Metrolabels will also computer-personalize the front side.
4. Metrolabels will produce labels from tapes (9-track, 1600 EPI) provided by Mr. Troxler, and label the 24,000 #10 regular envelopes.
5. Metrolabels will enter approximately 600 4-line names and addresses, with phone numbers, in upper and lower case into a database to be merged with the "A" tapes for personalization. Metrolabels will also provide Mr. Troxler with a 9-track tape of the database contents.
6. Metrolabels will fold the two letters and insert along with the #9 B&E, brochure, and 3-5/8" x 8-1/2" order card (Mr. Troxler will provide 105,000 brochures and order cards plus spoilage).

06040565416



7. Metrolabels will then live stamp the carrier envelope, seal, sort, tie, bag and mail the 105,000 pieces.

As discussed, the cost of this mailing is as follows; the quantities given are approximate. Final cost will be based on actual quantities.

81,500 #10 standard window envelopes
@ \$19.62/E.....\$ 1,609.03
24,500 #10 standard envelopes
@ \$17.92/E.....\$ 439.84
105,500 #9 BRDs @ \$16.03/E.....\$ 1,691.17
Printing of 82,000 3-1/2" x 11" two
side, four color letter
@ \$31.03/E.....\$ 2,544.46
Laser and personalize front side
81,000 letterhead @ \$47.00/E.....\$ 3,807.00
Printing of 24,500 3-1/2" x 11" two
side, five color letter @ \$30.53/E.....\$ 748.99
Generate 24,000 labels from tapes
provided by Mr. Trowler @ \$20.00/E.....\$ 480.00
Enter approximately 600 names and
addresses (with phone number) in
upper and lower case into database.
Merge with tapes to be personalized.
@ \$0.25/ea.....\$ 150.00
Produce 9-track tape of database
contents.....\$ 50.00
Typesetting, as required, should
not exceed.....\$ 200.00
Shipping charges..... as incurred
Courier charges @ \$15.00/trip..... as required
Convert to merge format (adding
MAIL-KEY); create MATCH-CODE and
load into one file; sort by
ZIP/MATCH-CODE/MAIL-KEY; remove
duplicates and make tape file 105,060
@ 0.02/each.....\$ 2,101.20
Re-sort by PHONE/ZIP/NAME and print
roster 105,060 @ 0.02/each.....\$ 2,101.20
Convert to upper and lower case
81,124 @ 0.01/each.....\$ 811.24
Label, live stamp, insert, sort, tie,
bag and mail 105,000 pieces
@ \$18.00/E.....\$ 1,890.00
Fold 105,000 pieces @ \$3.00/E/item.....\$ 325.00
Postage 105,000 pieces
@ \$0.11/ea.....\$11,550.00

TOTAL \$30,832.13

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86040565417



- 3 -

10,973.49

Final price of job to be determined by time required to process final tapes that arrived late plus overtime laser printing cost for weekend scheduling.

Metrolabels, Inc. requires an advance of ~~610,973.49~~ plus advance postage, for a total advance of ~~622,523.49~~. Balance due within 10 of job completion. Upon receipt of deposit, we will continue production as scheduled.

22,523.49

If this meets with your approval, please sign one copy and return to Metrolabels.

Should not be paid

Signed: _____

Date: _____

Sincerely,

W. H. Taylor Gilman

W. H. Taylor Gilman
Vice Pres., Marketing

1
states:
"Should
owe
8,308.64"

WHTB/cs

86040565418

IV, p. 10

Dunhill of Washington
representative for dunhill international list co. inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST OWNER: EPACO
7205 Lockport Pl.
Lorton, VA 22079
Attn: Don Hiner

Date 10-21-83

Dunhill's Order No.

Mailer's Order No.

Key No. Key Code A5

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: EPACO's Best Conservative RATE PER M 75.00
Special Hotline \$250.00
Contribution choose names with Telephones
nth select 10,000 volume
Keep record for later telephone select

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship Via Air Express to expedite
Please Call to Confirm Tape Specifications!

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
 2. Please record names used so they can be omitted on next order.
 3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
 4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.
- III, P. 11

Dunhill of Washington

representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST
OWNER:

Response Dynamics
2070 Chain Bridge Road, Suite 380
Vienna, VA 22180
Attn: Dave Kunko

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and Medalion

NAMES FROM YOUR LIST OF: American For Reagan Agenda RATE PER M Running Ch
Donors per ARA
10,000 nth select Keep record Gary Van B

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☐ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names

REQUESTED DELIVERY:
(If material does not arrive on schedule,
please notify us.)

SHIP TO: Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE:

SPECIAL INSTRUCTIONS:

SAMPLE ENCLOSED
SHIP VIA AIR EXPRESS TO EXPEDITE

PLEASE CALL TO CONFIRM TAPE SPECIFICATIONS

- IV, p. 12
1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
 2. Please record names used so they can be omitted on next order.
 3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
 4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

Dunhill of Washington

Representative for Dunhill International List Co., Inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST OWNER: Ultra Arts
150 E. 35th St.
New York, N.Y. 10016
Attn: Bob Jenkins

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code A3

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "National Review" Subscribers RATE PER M 100.00
Actives individuals
10,000 min test
keep record

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION... omit previously
furnished names _____

REQUESTED DELIVERY:
(If material does not arrive on schedule,
please notify us.)

SHIP TO: Metrolabels Inc.
512 Maple Ave., West
Vienna, VA 22180

MAIL DATE: 11-25-83

Attn: Taylor Gilmour

SPECIAL INSTRUCTIONS:

Sample Enclosed Also Prepayment
Ship via Air Express to expedite

Please call Dunhill to Confirm tape Specifications

Mailed Check
1008.00
10-31-83

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in-sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

IV, P. 13

Dunhill of Washington
Representative for Dunhill International List Co., Inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST
OWNER:

Rubin Response Management
3315 W. Algonguin Road
Rolling Meadows, IL 60008

Attn: Lynn

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code A1

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "Citizens for the Republic" RATE PER M 45.00

Donors File

50,000 Top Donors

by Contribution if Possible

☐ CHESHIRE LABELS

☐ GUMMED LABELS

☐ PRESSURE SENSITIVE LABELS

☐ MAGNETIC TAPE TR 9 BPI 1600

☐ 3X5 CARDS

☒ TEST (good cross section of file)

☐ TEST

☐ COMPLETE USE

☐ CONTINUATION ... omit previously
furnished names

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.

512 Maple Ave, West

Vienna, VA 22180

Attn: Taylor Gilmour

MAIL DATE:

SPECIAL INSTRUCTIONS:

Sample Enclosed

Ship via Air Express

Please call to confirm tape Specifications

MA:td Clerk
\$1835.00
10-31-83

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1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

Fred Woolf List Company
280 N. Central Ave.
LIST Hartsdale, N.Y. 10530
OWNER: Attn: Eileen

Key No.	Key	Code	C1
1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
6	6	6	6
7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
15	15	15	15
16	16	16	16
17	17	17	17
18	18	18	18
19	19	19	19
20	20	20	20
21	21	21	21
22	22	22	22
23	23	23	23
24	24	24	24
25	25	25	25
26	26	26	26
27	27	27	27
28	28	28	28
29	29	29	29
30	30	30	30
31	31	31	31
32	32	32	32
33	33	33	33
34	34	34	34
35	35	35	35
36	36	36	36
37	37	37	37
38	38	38	38
39	39	39	39
40	40	40	40
41	41	41	41
42	42	42	42
43	43	43	43
44	44	44	44
45	45	45	45
46	46	46	46
47	47	47	47
48	48	48	48
49	49	49	49
50	50	50	50
51	51	51	51
52	52	52	52
53	53	53	53
54	54	54	54
55	55	55	55
56	56	56	56
57	57	57	57
58	58	58	58
59	59	59	59
60	60	60	60
61	61	61	61
62	62	62	62
63	63	63	63
64	64	64	64
65	65	65	65
66	66	66	66
67	67	67	67
68	68	68	68
69	69	69	69
70	70	70	70
71	71	71	71
72	72	72	72
73	73	73	73
74	74	74	74
75	75	75	75
76	76	76	76
77	77	77	77
78	78	78	78
79	79	79	79
80	80	80	80
81	81	81	81
82	82	82	82
83	83	83	83
84	84	84	84
85	85	85	85
86	86	86	86
87	87	87	87
88	88	88	88
89	89	89	89
90	90	90	90
91	91	91	91
92	92	92	92
93	93	93	93
94	94	94	94
95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

RATE PER M 35.00
10.00 phones

☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

☐ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
 furnished names

SPECIAL INSTRUCTIONS:

Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

Sample Enclosed
Ship via Air Express to expedite

mailed check
10-31-82
\$346.69

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

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Dunhill of Washington
representative for dunhill international list co.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

Jami List Management
275 Forest Ave.
LIST Paramus, N.J. 07652
OWNER: Attn: Donna

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B2

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: Coin Country RATE PER M 55.00

Collectors

5,000 nth select Keep record

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:
(If material does not arrive on schedule,
please notify us.)

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

SHIP TO:

Metrolabels Inc.
512 Maple Ave., West
Vienna, VA 22180
Attn: Taylor Gilmour

Sample Enclosed

Ship via Air Express to expedite
Please call Dunhill to Confirm tape specifications

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

IV, p. 16

Dunhill of Washington
representative for dunhill international list co.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

Jami List Management
275 Forest Ave.
LIST Paramus, N.J. 07652
OWNER: Attn: Donna

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B3

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "American Collector" RATE PER M 55.00

Subscribers

5,000 nth select Keep record

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION... omit previously
furnished names

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

MAIL DATE: 11-25-83

SHIP TO:

Metrolabels Inc.
512 Maple Ave. West
Vienna, VA 22180
Attn: Taylor Gilmour

SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship via Air Express to expedite

Please call Dunhill to confirm tape Specifications

IV, p. 17

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

DW-301-83

ORDER FORM

Date: 10-20-83

(Please Print)

Name Brant Turner Title _____ Phone No. (____) _____

Company Dunhill of Washington

Street 1990 M. St. N.W. suite 570

City Washington D.C. State _____ Zip 20036

Ship Completed Job To: (If Different)
Metulabels, INC
512 Maple Ave West
Vienna, Va. 22180
ARN: Taylor Gilmour

QUANTITY	LIST NAME	PRICE PER M	TOTAL PRICE
10,000	Doctors @ Home Address Choose those with telephones - <u>Keep Record - Provide Phones</u> <u>Key Code - A4</u>		
		Minimum Shipping Charges	\$7.50
		Fla. / N.Y. Sales Tax	

MINIMUM ORDER \$200.00* Full payment required in advance from unrated firms.
 Terms are net cash 30 days. Bank references required for open account.

Total Enclosed* \$

GEOGRAPHICAL COVERAGE ☐ All States ☒ Cross Section ☐ States Checked ☐ Nth Name (Random) - add \$2.00/M	MATERIAL ☐ Gummed Labels - add \$2.50/M ☐ Cheshire (Machine Affixable) - no charge ☐ Pressure Sensitive (Peel & Stick) - add \$6.00? ☐ 3 x 5 Cards - add \$17.50/M ☒ Mag Tape TR 9 BPI 1600	ADDITIONAL SELECTIONS ☐ SCF - add \$5.00/M ☐ State - add \$2.50/M ☐ Keycoding (4 digits) - add \$2.00/M ☐ Title Address - add \$2.00 ☐ Telephone Numbers - add \$10.00/M
--	---	---

Card Holder's Name (Please Print)

Card Holder's Signature



Please Check Payment Ty

☐ Master Card

☐ American Express

☐ Visa

☐ Diners Club

Card No. _____

Card Valid From _____ To _____

IV, p. 18

Dunhill of Washington
Representative for Dunhill International List Co.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

James Jorg List Management
28 W. 44th Street
New York, N.Y. 10036
Attn: Ninfa Lopiccato

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B1

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and Medallion

NAMES FROM YOUR LIST OF: "Medalic Art"

RATE PER M Running Charges
Per. Bob Belden
at Medalic Art

Mail order Buyers
Volume
All 43,936

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☐ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:
(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave. West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship via Air Express to expedite

IV, P. 19

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

DW-301-83

ORDER FORM

Date: 10-20-83

(Please Print)

Name Brant Turner

Title _____

Phone No. (____) _____

Company Dunhill of WashingtonStreet 1990 M. St. N.W. suite 570City Washington D.C.

State _____

Zip 20036

Ship Completed Job To: (If Different)

Metulabels, INC
512 Maple Ave West
Vienna, Va. 22180
Ann Taylor Gilmore

QUANTITY	LIST NAME	PRICE PER M	TOTAL PRICE
10,000	Doctors @ Home Address Choose those with telephones - <u>Keep Record - Provide Phones</u> <u>Key Code - A4</u>		
		Minimum Shipping Charges	\$7.50
		Fla. / N.Y. Sales Tax	

MINIMUM ORDER \$200.00 * Full payment required in advance from unrated firms.
 Terms are net cash 30 days. Bank references required for open account.

Total Enclosed* \$

GEOGRAPHICAL COVERAGE

- ☐ All States
☒ Cross Section
☐ States Checked
☐ Nth Name (Random) - add \$2.00/M

MATERIAL

- ☐ Gummed Labels - add \$2.50/M
☐ Cheshire (Machine Affixable) - no charge
☐ Pressure Sensitive (Peel & Stick) - add \$6.00
☐ 3 x 5 Cards - add \$17.50/M
☒ Mag Tape TR 9 BPI 1600

ADDITIONAL SELECTIONS

- ☐ SCF - add \$5.00/M
☐ State - add \$2.50/M
☐ Keycoding (4 digits) - add \$2.00/M
☐ Title Address - add \$2.00
☐ Telephone Numbers - add \$10.00/M

Card Holder's Name (Please Print)

Card Holder's Signature



Please Check Payment Type

- ☐ Master Card
☐ American Express
☐ Visa
☐ Diners Club

Card No. _____

Card Valid From _____ To _____

IV, p. 20



TAPE/CODE ROSTER

CODE	SOURCE	DESCRIPTION
-----	-----	-----
USA01	CPS DATA	CP82 FOR CONSERVATIVE COMMEMORATIVE SOCIETY
USA02	CPS DATA	NATIONAL REVIEW FOR ML
USA03	CPS DATA	HUMAN EVENTS ACTS FOR ML
USA04	DUNHILL INT'L LIST CO	DOCTORS
USA05	DOMINION DP INC	LOBBYIST - NO WOMEN
USA06	WILAND & ASSOC INC	THOMPSONS SPECIAL SELECT
USA07	WILAND & ASSOC INC	FCM SPECIAL CONSERVATIVES W/PHONES
USA08	DUNHILL OF WASHINGTON	REGAN COMMEMORATIVE STATUETTE & MEDALLION
USA09*	C & L DATA SYSTEMS	MEDALLIC ART
USA10	TROXLER	TROXLER HOUSE LIST (DATABASE)
USA12	C & G DATA INC	C & G DATA INC
USA13*	C & L DATA SYSTEMS	MEDALLIC ART

* FROM SAME SOURCE TAPE

NOTE: THERE IS NO CODE USA11

IV, p. 21

dunhill of washington

representative for dunhill international list inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

INVOICE NUMBER: DW-301-83

DATE: 1-30-84

TO: Conservative Commemorative Society
26555 Evergreen Rd. Suite 1116
Southfield, Mi., 48076

Description	Quantity	\$ Per M.	Extension
Doctors at Home address	10,424	40.00	416.96
EPACO's Conservatives	10,000	75.00	750.00
Lobbyists	8,314	35.00	290.99
Collectors Media	5,000	45.00	225.00
National Review	10,000	100.00	1,000.00
Medalic Arts	43,936	N/C	N/C
CFR	1,787	200.00	357.40
Campaign For the 80's	5,000	60.00	300.00
Human events	5,000	100.00	500.00
Thompson Special Select	5,000	80.00	400.00
SUBTOTAL			4,240.35
2nd Run			
Copies			
Press. labels			
Nth Name			
State counts			
SCF Coding			
Key Coding			
Title address			
Telephone numbers	18,314	10.00	183.14
3 x 5 cards			
MAG Tape	10	20.00	200.00
Other			
Shipping			76.51
SUBTOTAL			4,700.00
TOTAL			
Tax			
Invoice TOTAL			
Deposit Received			(\$4,700.00)
Amount Due			-0-

* Please include Tax I.D. No. if exempt.

Please see reverse side.

IV p. 22

**MEDALLIC ART COMPANY**

Old Ridgebury Road

P.O. Box 857

Danbury, Connecticut 06810

Medalist to America Since 1900

(203) 792-3000

INVOICE

PAGE

74256

1

DATE

1/19/84

III, p. 23

SOLD TO
CONSERVATIVE COMM SOCIETY
2455 EVERGREEN ROAD
TRAVELERS TWRB SUITE 1116
SOUTHFIELD MI 48076

SHIP TO
CONSERVATIVE COMM SOCIETY
2455 EVERGREEN ROAD
TRAVELERS TWRB SUITE 1116
SOUTHFIELD MI 48076

CUSTOMER NO.	SHIP VIA	ORDER NO.	SLS. NO.	REFERENCE NO.	TERMS	
1-13992000		C030170	11041	R.J.L.	1/10 NET 30	
NUMBER	DESCRIPTION	U/M	QUANTITY SHIPPED	QUANTITY BACK ORDERED	UNIT PRICE	AMOUNT
9999 1275 11275325 901 9501 00135	CONSERVATIVE COMM SOCIETY PHOTOGRAPHIC SERVICE CHARGE 2-3/4" BRONZE ART MEDAL 85/15 GAUGE 0 BRONZE BLANK STANDARD EDGEMARK MEDIUM OXIDIZED FINISH 2-3/4" CARDBOARD BOX	EA EA	1	1.000	925.100 10.250	925.10
TOTAL WEIGHT	NET SALES AMOUNT	TRADE DISCOUNT	MISCELLANEOUS CHGS	TAXES	TERMS DISCOUNT	AMOUNT DUE
	925.10				9.25	925.10

Any item marked "Backordered" is not included in this shipment but will be shipped as soon as available. When corresponding with us concerning your order please refer to your order number and invoice number.



April 9, 1984

Mr. Philip B. Fischer
The Conservative Commemorative Society Inc.
26555 Evergreen Road
Travelers Towers
Suite 1116
Southfield, MI 48076

Dear Mr. Fischer,

Thank you for your letter dated April 5, 1984,
enclosing cheque for \$5,000.00.

However, we wish to inform you that the price
does not include packing and freight, which
was clearly established between myself and
Lee Troxler.

Sincerely,

Kenneth Ecclestone
#2441

Kenneth D. J. Ecclestone
Vice President

KSJE/rh

IV, P. 24

RECEIVED AT THE FEC
GCC # 7494
85 MAY 16 P12: 48

ATTENTION: Matt Gerson
FROM: L. William Troxler
RE: MUR 1834

May 10, 1985

Okay, here we go again!

I suppose I should repeat: please return attached materials and hold all items confidential.

Based on my understanding of this unfortunate matter, and in the light of our conversations, I am submitting this request for a pre-probable cause conciliation.

I am also filing under separate cover (thank God I dropped out of law school!) all my tardy PAC reports. And attached you will find the letter I received from my friends at the Department of Justice.

It is my sincere hope, and the direction of my efforts, that this matter can be swiftly resolved in the best interests on all taxpayers and particularly one of them.

Attachment II

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL
MAY 17 P 3: 26



85 MAY 16 11

P12: 48

Washington, D.C. 20530

APRIL 12, 1984

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

Dear Mr. Troxler:

This is to advise that we have recently received a complaint regarding a political solicitation sent over your signature on behalf of an organization called "Great Through '88." A copy of this solicitation is enclosed herein.

The solicitation requests contributions to "Great Through '88," through the purchase of "Great Eagle Medallion Sculptures." Solicitees are advised that all proceeds above the market value of the medallions will be used by "Great Through '88" to support the reelection effort of President Ronald Reagan and the election of conservative Congressmen who support the President. The solicitation was addressed to Fred Fielding, "W H O 2nd Floor, Executive Ofc of Pres, Washington, DC," and was received by Mr. Fielding at his place of federal employment at this address.

This is to advise that Section 607 of Title 18 of the United States Code prohibits the transmission of political solicitations such as the enclosed to addresses where federal officers and employees are performing official duties. Violations of Section 607 are federal felonies, punishable by imprisonment for up to three years and a fine of up to \$5,000.

You will note that the federal character of the address to which the instant solicitation was sent is evident on the face of the solicitation.

We trust that you will take immediate and personal measures to delete this address, and all other addresses bearing indicia of a federal nature, from your solicitation lists.

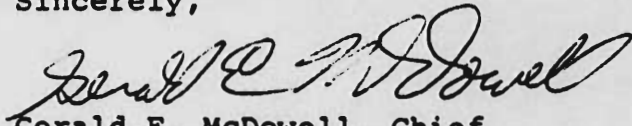
V, 2

86040565434

In addition, the Federal Election Campaign Act, 2 U.S.C. §431 et seq., requires that any communication by way of general public political mailings or advertisements which solicits contributions for a federal election, or which advocates the election of a clearly identified federal candidate, state on the face of the communication the entity who paid for or authorized the communication. 2 U.S.C. §441d. The enclosed solicitation advocates the election of President Reagan and other federal candidates, and solicits contributions toward that end, but does not appear to reflect such a notice. We have referred this aspect of the matter to the Federal Election Commission, which has civil and administrative jurisdiction over such matters. See 2 U.S.C. §437g(a) and (d).

We trust that this information will prove useful to you in any future solicitations.

Sincerely,



Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

Enclosure

V, 3

8604055435

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

26555 Evergreen Road • Travelers Towers • Suite 1116
Southfield, Michigan 48076 • (313) 355-1050

NEWS RELEASE

FOR IMMEDIATE RELEASE
January 12, 1983

CONTACT: Lee Troxler
(202) 338-6962

NEW PAC UNVEILS EXCEPTIONAL PRECEDENTS IN POLITICAL ART

WASHINGTON -- The newly formed political action group, "Great Through '88," will unveil the Great Eagle Medallion Sculpture (GEMS) collection at a third anniversary celebration of President Reagan's Inauguration. All proceeds above the established market value of the collection will go toward reelecting Ronald Reagan and conservative candidates who support the themes of the Reagan presidency.

The unveiling will be held on February 4, 1984, at the Washington Hilton Hotel, Georgetown Room at seven o'clock. The champagne reception will usher in the Third Anniversary Inaugural Ball in the Hilton's International Ballroom.

"Great Through '88" is a political organization deeply committed to American patriotism and on-going conservative leadership. Small in size, the PAC seeks to elevate the ideals of family, liberty and prosperity.

The Conservative Commemorative Society, Inc., a Michigan based political marketer, has been retained by Great Through '88 to coordinate the financing and marketing of the project.

As the November elections approach, and the GOP slogan "Lets Make America Great Again" becomes "Making America Great" or "Great Through '88," a concerted attempt is being made to offer conservatives an enduring investment opportunity in return for their political contributions.

The GEMS are available through a direct mail campaign, complemented by a toll-free order and telemarketing capability, and advertising in "National Review" magazine.

Being offered are high-relief art medallions -- in a choice of bronze, fine silver or 14-karat gold, presented on finely crafted mahogany sculptures -- in a choice of the Great Eagle or Republican Elephant. They are unique, beautiful, artpieces of heirloom quality; hand-carved in America, they symbolize the happiness and prosperity that Ronald and Nancy Reagan radiate from the Executive mansion.

Attachment II

The medallions are minted by the Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and the Ronald Reagan Inaugural Medallion.

The sculptures and the medallions are created by Edward Praughton of Utah, the western sculptor renowned for the power and force he brings to his art. It is fitting that Mr. Praughton accept this challenge to create a lasting tribute to the leading, involved and caring Americans who make America the greatest country in the history of the world, since Mr. Praughton was asked by Ronald Reagan to create his Inaugural medallions.

The medallion obverse features a portrait of the President and his First Lady, in formal attire. This is believed to be a first, a collectors' item of extraordinary numismatic importance, especially in light of current favorable market conditions for precious metals.

The GEMS to be unveiled are number one in the limited series of 500. Number One and Number Two will be presented to Ronald Reagan and George Bush respectively at a later date. Limited numbers of the political art will be offered to conservatives in attendance at the unveiling, compliments of the Conservative Commemorative Society, Inc.

Also on display at the unveiling ceremony will be an advance of publication printing of the book, "Along Wit's Trail," edited by L. William Troxler. Filled with President Reagan's favorite jokes, old yarns and quips, the book illustrates how he uses his gift of humor to out-wit political adversaries and endear friends. The book will be published by Holt Rinehart & Winston in the Spring.

Enclosed is a brochure describing the Great Eagle Medallion Sculpture collection.

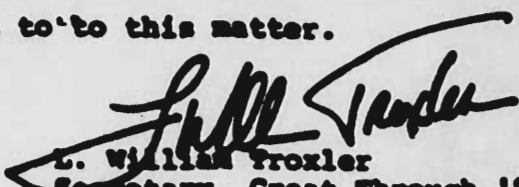
THE FEC
05 MAY 88 09:00

ATTENTION: FEC RECORDS DIVISION

RE: PAC ID # C00171066

Please be advised that the above referenced Political Action Committee, Great Through '88 has never filed the appropriate reporting forms, has not received nor disbursed any funds, and is not functioning any longer.

Thank you for your attention to this matter.


L. William Troxler
Secretary, Great Through '88

36040565438
93033734770

Attachment VII

RECEIVED AT THE FEC

G.C.C. # 7494

85 MAY 18 PM: 12

ATTENTION: Matt Gerson
FROM: L. William Troxler
RE: MUR 1834

May 10, 1985

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
MAY 17 12 P 3: 26

Okay, here we go again!

I suppose I should repeat: please return attached materials and hold all items confidential.

Based on my understanding of this unfortunate matter, and in the light of our conversations, I am submitting this request for a pre-probable cause conciliation.

I am also filing under separate cover (thank God I dropped out of law school!) all my tardy PAC reports. And attached you will find the letter I received from my friends at the Department of Justice.

It is my sincere hope, and the direction of my efforts, that this matter can be swiftly resolved in the best interests on all taxpayers and particularly one of them.

86040565439

GEMCD:NSS:pk
186-017-16

85 MAR 18 12:00

Washington, D.C. 20530

APRIL 18, 1984

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

Dear Mr. Troxler:

This is to advise that we have recently received a complaint regarding a political solicitation sent over your signature on behalf of an organization called "Great Through '88." A copy of this solicitation is enclosed herein.

The solicitation requests contributions to "Great Through '88," through the purchase of "Great Eagle Medallion Sculptures." Solicitees are advised that all proceeds above the market value of the medallions will be used by "Great Through '88" to support the reelection effort of President Ronald Reagan and the election of conservative Congressmen who support the President. The solicitation was addressed to Fred Fielding, "W H O 2nd Floor, Executive Ofc of Pres, Washington, DC," and was received by Mr. Fielding at his place of federal employment at this address.

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You will note that the federal character of the address to which the instant solicitation was sent is evident on the face of the solicitation.

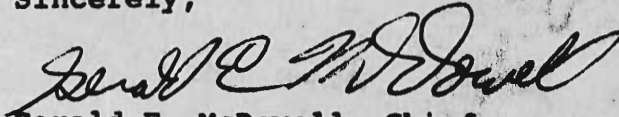
We trust that you will take immediate and personal measures to delete this address, and all other addresses bearing indicia of a federal nature, from your solicitation lists.

36040565440

In addition, the Federal Election Campaign Act, 2 U.S.C. §431 et seq., requires that any communication by way of general public political mailings or advertisements which solicits contributions for a federal election, or which advocates the election of a clearly identified federal candidate, state on the face of the communication the entity who paid for or authorized the communication. 2 U.S.C. §441d. The enclosed solicitation advocates the election of President Reagan and other federal candidates, and solicits contributions toward that end, but does not appear to reflect such a notice. We have referred this aspect of the matter to the Federal Election Commission, which has civil and administrative jurisdiction over such matters. See 2 U.S.C. §437g(a) and (d).

We trust that this information will prove useful to you in any future solicitations.

Sincerely,



Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

Enclosure

36040565441

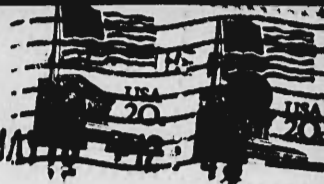
86040565442

L. William Troxler
1730 Glendon Ave #11
Los Angeles, CA 90024

Matt Gerson
Office of General Counsel
Federal Elections Commission
Washington, DC 20463



85 MAY 13



ATTENTION: Matt Gerson
FROM: L. William Troxler
RE: MUR 1834

607312 THE FBI
93 APR 22 PM 1:00
APR 29 P 3:15
Welcome to my case. Since I am providing you with all the information you ask for, please allow me the courtesy of one question. Can I bill the government for all the expenses incurred in this investigation after you drop all charges because you have no case?

I'm curious, because I will spend into the triple digits soon, and I cannot afford it. Actually, I have two questions. Couldn't you tell from my October 31, 1984 letter that I am either insane or innocent? Neither can be punished!

And of course, I have a few requests: please return all attached materials and hold all items confidential. And permit me to shed some light on this very unfortunate matter. CCS Inc. principals were direct mail neophytes trying to help reelect President Reagan. They didn't even know they were violating 441d(a)(3). Had a second mailing been possible, they would have corrected the error. They experienced a veritable slew of problems, have learned their lessons the hard way, and look forward to concluding this matter swiftly.

RESPONSES TO SUBPOENA ORDER

1. Documents attached.
2. Documents attached.
3. The mailing house accidentally included my list of friends and associates on the master mailing file. Since I served honorably in the White House for awhile, some government names were mailed without the prior knowledge or consent of CCS Inc. My personal list is not organized for review, but if you ask, I'll go through my Rolodex.
4. Attached are all CCS Inc. order forms. The Great Eagle Medallion Sculpture was carved by Edward Fraughton, the medallions were produced by Medallic Art Company, the sculptures were produced by Proud Traditions Ltd.
5. CCS Inc. never came close to covering expenses, and then CCS Inc. went bankrupt trying to meet its financial obligations. So, Great Through '88 never received any payments from CCS Inc. Thus, no bank account was ever established, and no reports were ever filed.

36740565443

The ^{FEC ad in National Review} Great Eagle Medallion Sculpture

The American Eagle Sculpture, and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.

The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

Six Ways The Great Eagle Medallion Sculpture Will Delight the Connoisseur

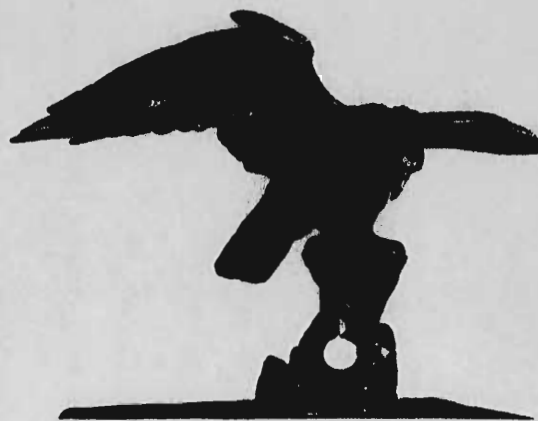
An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions

REQUEST DETAILS

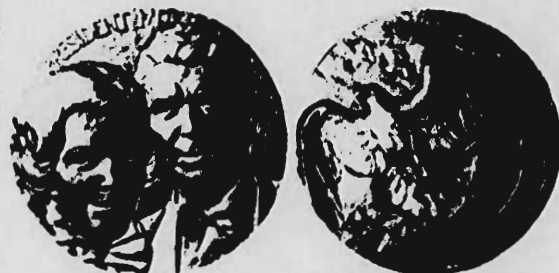
PHONE ORDERS: It's the easiest way to order. Just pick up the phone and call toll free during business hours — 800 435-4484. In Illinois, call 800 892-6990 Ext 264. Thank you for only making credit card orders over the phone. Our customer service representative will be happy to answer your questions and take your suggestions.

	Each
• Great Eagle Sculpture	\$1050
• GOP Elephant Sculpture	650
• Gold medallion	950
• Silver medallion	95
• Bronze medallion	35

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.



An Exceptional Precedent in Commemorative Art



The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.

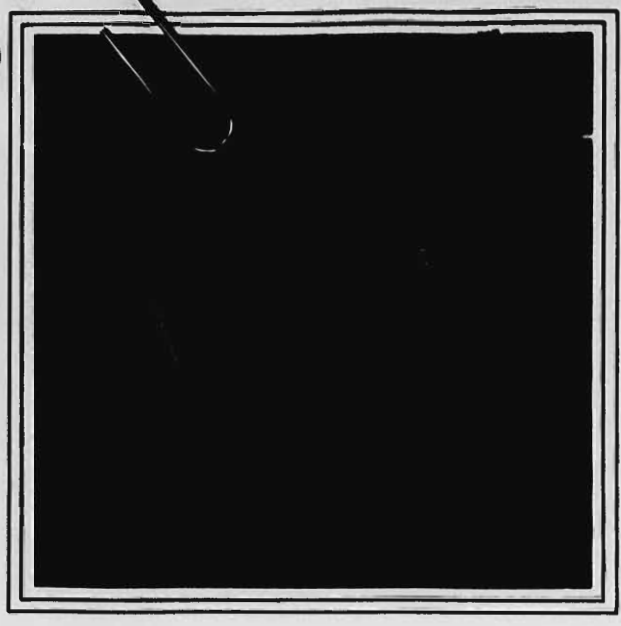


OFFICIAL SPECIFICATIONS: By arrangement with the Conservative Commemorative Society, gold and silver medallions are strictly limited, serially numbered, and authenticated. These high-relief medallions include a protective display case. The 14KT gold art medal is 1 1/2" in diameter and contains approximately 1 1/2 troy ounces of gold. Gold edition limit: 500. The silver art medal is .999 fine, also 1 1/2", and contains approximately 1 1/4 troy ounces of silver. Silver edition limit: 1500. The bronze is 2 3/4", hand rubbed to a rich antique patina. The sculptures are hand-carved in America from solid mahogany. The Great Eagle is 18" tall, with a 24" wingspan. The GOP Elephant is 9" high and 11" long. Sculpture edition limit: 1,000 of each.

3 6 0 4 0 5 6 5 4 4 4

FEC #1
direct mail
brochure
response device,
return envelope
& original mailer
envelope

The Great Eagle Medallion Sculpture



An Exceptional Precedent
in Commemorative Art

8 6 0 4 0 5 6 5 4 4 5

Why You Deserve This Tribute As America's Great Eagle Now

In this greatest of all countries, you are one of the leading, involved and caring Americans, the Great Eagles who will keep America great.

In President Reagan's own words: "We were sent here to move America forward again by putting people back in charge of their own country; to promote growth by placing limits on the size and power of government; to give individuals the opportunities to reach for their dreams; to strengthen the institutions of family, school, church and community; to make the United States a stronger leader for peace, freedom and progress abroad; and, through it all, to renew our faith in God who has blessed our land."

To join Ronald and Nancy Reagan as a Great Eagle of American Society — proudly accept this tribute in time for the January 20th signing ceremony, and choose one of the following complementary gifts.

The book of Ronald Reagan's speeches, *A Time for Choosing*, published by Americans for the Reagan Agenda, a national grass roots organization devoted to supporting the themes of Ronald Reagan's presidency. Or the book of Ronald Reagan's humor, *Along Wit's Trail*, edited by L. William Troxler. Filled with the President's favorite jokes, old yarns, and quips — the book illustrates how he uses his gift of humor to outwit political adversaries and endear friends.

On behalf of Great Through '88, the Conservative Commemorative Society, and your fellow Great Eagles, we sincerely hope that your Great Eagle Medallion Sculpture will be a source of pride and inspiration for you and your loved ones, for now and through the years.

REQUEST DETAILS

PHONE ORDERS: It's the easiest way to order. Just pick up the phone and call toll free during business hours — 800 435-4484. In Illinois, call 800 892-6990 Ext 264. Thank you for only making credit card orders over the phone. Our customer service representative will be happy to answer your questions and take your suggestions.

DELIVERY: UPS delivery time for the commemoratives is four to six weeks, a little longer for personalized editions.

PRICES: Due to precious metal market fluctuations, prices are subject to change. For your convenience, we'll pick up all shipping, insurance, handling and state taxes. And don't forget, contributions may qualify for tax credits.

SATISFACTION GUARANTEED: You must be satisfied, or return the commemoratives within 30 days for a prompt exchange, or refund of the price of the commemorative. Please understand that personalized editions cannot be returned.

OFFICIAL SPECIFICATIONS: By arrangement with the Conservative Commemorative Society, gold and silver medallions are strictly limited, serially numbered, and authenticated. These high-relief medallions include a protective display case. The 14KT gold art medal is 1 1/2" in diameter and contains approximately 1 1/2 troy ounces of gold. Gold edition limit: 500. The silver art medal is .999 fine, also 1 1/2", and contains approximately 1 1/4 troy ounces of silver. Silver edition limit: 1500. The bronze is 2 3/4", hand rubbed to a rich antique patina. The sculptures are hand-carved in America from solid mahogany. The Great Eagle is 18" tall, with a 24" wingspan. The GOP Elephant is 9" high and 11" long. Sculpture edition limit: 1,000 of each.

SPECIAL NOTE: Sculptor Fraughton's original bronze castings will be put on display during 1984, with the finest casting being presented to President Ronald Reagan. If you are interested in these bronze sculptures, tell us on your request form.

A Tribute To America's Great Eagles

From Great Through '88



Your Official Medal of Honor ...

Offered in 14-karat gold, fine silver, or bronze — your choice.

The obverse features a high-relief portrait of the President and his First Lady, in formal attire. This is a first, an unprecedented collectors' item with extraordinary numismatic importance. Soaring with the first couple is the Great Eagle, representing those citizens who are helping to make America great again.

The reverse features the Great Eagle in majestic flight clutching the scroll "Family, Liberty, Prosperity." The special significance of these words is explained to the right.

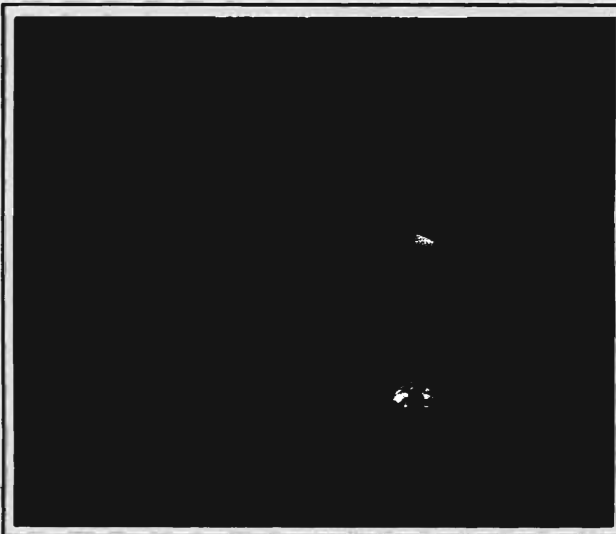
The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

... And Its Impressive Display

These are hand carved and beautifully detailed solid mahogany sculptures. They recreate the old-fashioned elegance of America's great heritage.

The American Eagle Sculpture, and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.



Chiseled into the heartwood of the finely crafted sculpture is an inspirational message on conservatism:

*Our determined quest
For eternal truths
Keeps America
Great through the years*

Along with this tome, your name or preference can be carved into the base, and dated January 20, 1984, so that we may begin our fourth anniversary together. Signed by Fraughton at a special January 20th ceremony, your commemorative keepsake is complete.

The Great American Eagle has been authorized as the official emblem of these commemoratives for the grandest of reasons:

Family

No other creature so genuinely reflects love of family as the American Eagle, building a new and better nest on top of the old, year after year. Our Eagle spends more care in the education of its young than any other in our skies and is faithful through the years.

Liberty

On our Great Seal since 1782, the American Eagle is proud freedom symbolized. He is the absolute master of flight, found gliding 10,000 feet above the earth.

Prosperity

Capable of detecting a fish three miles away, our American Eagle can capture it in one long, slanting dive. With his power, the American Eagle prospers in all the continental United States and Alaska.

You, the Great Eagle of our society, are the embodiment of Family, Liberty, Prosperity. We know you will cherish your magnificently patriotic Great Eagle Medallion Sculpture.

**Six Ways The
Great Eagle Medallion Sculpture
Will Delight the Connoisseur**

**An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions**

FEC:
direct mail
to "political select"



*In Honor of
the Great Eagles
of American Society*

Mrs W M Mitchell
PO Box 26 Cruz Bay
St John, VI 00830

Dear Mrs Mitchell,

The greatest country in the history of the world is the United States today. Family. Liberty. Prosperity.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great.

In Your honor, *Great Through '88* has now authorized the historic Great Eagle Medallion Sculpture collection -- as a tribute to you.

Let me explain.

We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign. And we wish to celebrate your role as a guiding force in the American society of tomorrow.

Our on-going conservative presidential leadership offers the greatest promise for our future. President Reagan, speaking to his executive staff on January 20, 1983, said it best:

"We were sent here to move America forward again by putting people back in charge of their own country...to give individuals the opportunities to reach for their dreams."

Those of us listening to the President at that meeting were inspired to form *Great Through '88*, so that we all could contribute our most, and best, again. Along with the Conservative Commemorative Society, we've launched an ambitious and long-overdue undertaking.

We have authorized a unique collection of high-relief art medallions presented on hand carved mahogany sculptures -- as a tribute to you and to President Reagan.

Congratulations Great Eagle!

8604055447

8 6 0 4 0 5 5 4 4 3

You should know that all proceeds from this limited issue go to support Ronald Reagan's reelection drive, and to help elect conservative Congressmen who support the President. Therefore, contributions may qualify for a tax credit.

The enclosed brochure illustrates the collection in detail.

In case you're curious, the idea for the collection was born from Ronald Reagan's love of the outdoors as a woodsman.

The centerpiece of it all is the Great Eagle Medallion Sculpture. The acronym, GEMS, is really quite fitting -- for they are superb gems.

Your official Medal of Honor is offered in 14-karat gold, fine silver, or bronze -- your choice. It is minted by Medallic Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the Medal of Honor are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

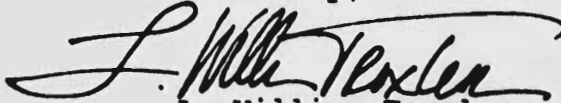
To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4484 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the foot of the sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

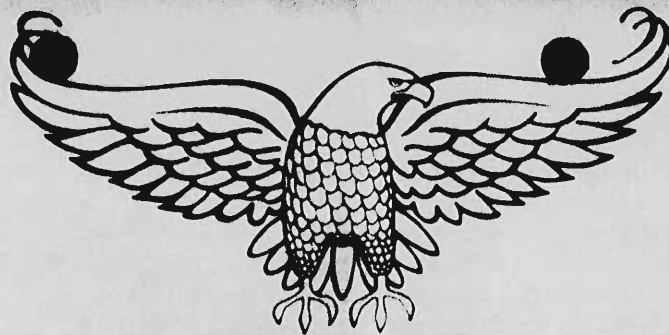
Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,


L. William Troxler
Director

P.S. Remember, proceeds go toward making Ronald Reagan the first successful two-term President since Dwight D. Eisenhower. Remember too, order by January 20th for a personalized edition and complimentary books.



*In Honor of
the Great Eagles
of American Society*

FEC:
direct mail
to "collector" select

Dear American,

The greatest country in the history of the world is the United States today.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great.

Now, Great Through '88 has authorized the Great Eagle Medallion Sculpture collection -- an historic investment opportunity for you.

Let me explain.

Great Through '88, a political organization deeply committed to America and on-going conservative leadership, wishes to celebrate your role as a guiding force in the American society of tomorrow.

What kind of society will it be?

- * America moves forward again by putting people back in charge of their own country;
- * The size and power of government is limited to allow for private growth;
- * Individuals are given the opportunity to reach for their dreams;
- * Ideals of family, liberty and prosperity are strengthened.

This is the America Great Through '88 is proudly working for.

By arrangement with the Conservative Commemorative Society, we have authorized a limited edition collection of high-relief art medallions presented on hand carved mahogany sculptures. These are exceptional works of commemorative art.

So, for you they are a fine investment. For America, they represent the greatest promise for the future. That's because all proceeds from the limited issue will go to support conservative candidates in the 1984 elections. Therefore, contributions may qualify for a tax credit.

The enclosed brochure illustrates the collection in detail. Here is a summary:

- An Investment of Value-
- World Famous Craftsmanship-
- Unique, Exclusive Significance-
- Strictly Limited Editions-
- Unconditional Guarantee-

The centerpiece of it all is the Great Eagle Medallion Sculpture. The acronym, GEMS, is really quite fitting -- for they are superb gems.

The first-issue collector Medallions are offered in 14-karat gold, fine silver, or bronze -- your choice. They are minted by Medallion Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the medallions are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

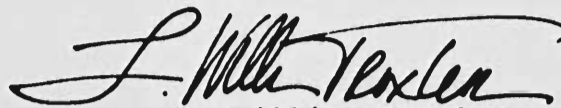
To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4484 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the base of the sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,


L. William Troxler
Director

P.S. This is not only an exceptional investment opportunity for you, it helps ensure that America will be *Great Through '88*.

dunhill of washington

representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

October 21, 1983

Philip B. Fischer
26555 Evergreen, Suite 1116
Southfield, MI 48076

Dear Mr. Fischer,

As you know I am handling the mailing list orders for Lee Troxler's project. Enclosed please find copies of the list orders that were sent out on Friday October 21. These order forms indicate the prices for each list as a price per thousand names. The following is an itemized estimate of the lists costs. As a list broker I am required to have the list costs in advance and to guarantee payment to each supplier. Please forward a check payable to Dunhill of Washington for the amount indicated below as soon as possible.

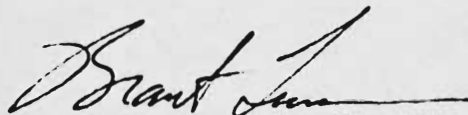
List Name	Quantity	Price Per Thousand	Total
CFTR	50,000	45.00	\$2,250.00
ARA	10,000	10.00	100.00
National Review	10,000	100.00	1,000.00
Doctors @ Home	10,000	45.00	450.00
EPACO's Cons.	10,000	75.00	750.00
Medalic Art	43,936	10.00 est.	100.00
Lobbyist	8,000	45.00	360.00
Coin Country	10,000	55.00	550.00
American Collector	10,000	55.00	550.00

Estimated Shipping and Handling
Via Air Express Both Ways
TOTAL

\$ 200.00
\$6,310.00

Thanks for your timely assistance in this matter.

Sincerely,



Brant Turner
Director of Sales

FEC #2
Vendor for
mail lists &
name of mailing house.
I don't have list of 130K
names mailed by House.

36040565451



MEDALLIC ART COMPANY 4 5 2

Old Ridgebury Road
P.O. Box 857
Danbury, Connecticut 06810
Medalist to America Since 1900

(203) 792-3000

74254	1
1/19/84	

SOLD TO
CONSERVATIVE COMM SOCIETY
2455 EVERGREEN ROAD
TRAVELERS TWRB SUITE 1116
SOUTHFIELD

MI 48074

SHIP TO
CONSERVATIVE COMM SOCIETY
2455 EVERGREEN ROAD
TRAVELERS TWRB SUITE 1116
SOUTHFIELD

MI 48074

CUSTOMER NO.	SHIP VIA	ORDER NO.	QUANTITY	UNIT PRICE	TOTAL	NET 30
1-13892000		C030170	11041	R.A.		1/10 NET 30
ITEM NUMBER	DESCRIPTION	EA	EA			
99999	CONSERVATIVE COMM SOCIETY					
01275	PHOTOGRAPHIC SERVICE CHARGE	EA	1		920.100	920.10
511275325	2-3/4" BRONZE ART MEDAL	EA		1.000	10.200	
901	85/15 GAUGE 0 BRONZE BLANK					
9501	STANDARD EDGEMARK					
80135	MEDIUM OXIDIZED FINISH					
	2-3/4" CARDBOARD BOX					



April 9, 1984

Mr. Philip B. Fischer
The Conservative Commemorative Society Inc.
26555 Evergreen Road
Travelers Towers
Suite 1116
Southfield, MI 48076

Dear Mr. Fischer,

Thank you for your letter dated April 5, 1984,
enclosing cheque for \$5,000.00.

However, we wish to inform you that the price
does not include packing and freight, which
was clearly established between myself and
Lee Troxler.

Sincerely,

Kenneth D. J. Ecclestone
Vice President

KSJE/rh

86040565453

See - as you requested

METROLABELS, INC.
512 Maple Avenue, West
Vienna, Virginia 22180

December 28, 1983

Mr. Lee Troxler
1000 Thomas Jefferson Street
Suite 508
Washington, DC 20007

Dear Mr. Troxler,

Metrolabels is pleased to offer you this proposal. We appreciate your assistance in stating your requirements so clearly.

The tasks involved are the following:

1. Metrolabels will have 81,500 #10 standard window and 22,500 #10 regular envelopes printed in one color (gold ink). Metrolabels will also have 113,500 #9 B&E printed in black ink.
2. Metrolabels will also have 24,500 8-1/2" x 11" letters printed on 50%, white off-set paper with three colors (gold, navy, and black) printed on the front side and two colors (black and navy) printed on the reverse.
3. Metrolabels will have 82,000 8-1/2" x 11" letters on 24%, white Hammermill Bond printed with two colors (navy and black) offset printed on the back side and two colors (navy and gold) offset printed on the front side. Metrolabels will also computer-personalize the front side.
4. Metrolabels will produce labels from tapes (9-track, 1600 EPI) provided by Mr. Troxler, and label the 24,000 #10 regular envelopes.
5. Metrolabels will enter approximately 600 4-line names and addresses, with phone numbers, in upper and lower case into a database to be merged with the "A" tapes for personalization. Metrolabels will also provide Mr. Troxler with a 9-track tape of the database contents.
6. Metrolabels will fold the two letters and insert along with the #9 B&E, brochure, and 3-5/8" x 8-1/2" order card (Mr. Troxler will provide 105,000 brochures and order cards plus spoilage).

(703) 938-0000

86040565454



- 2 -

7. Metrolabels will then live stamp the carrier envelope, seal, sort, tie, bag and mail the 105,000 pieces.

As discussed, the cost of this mailing is as follows; the quantities given are approximate. Final cost will be based on actual quantities.

81,500 #10 standard window envelopes	
@ \$19.62/E.....	\$ 1,599.03
24,500 #10 standard envelopes	
@ \$17.92/E.....	436.84
105,500 #9 BRES @ \$16.03/E.....	1,691.17
Printing of 82,000 8-1/2" x 11" two	
side, four color letter	
@ \$31.03/E.....	2,544.46
Laser and personalize front side	
81,000 letterhead @ \$47.00/E.....	3,807.00
Printing of 24,500 8-1/2" x 11" two	
side, five color letter @ \$30.53/E.....	738.99
Generate 24,000 labels from tapes	
provided by Mr. Troxler @ \$20.00/E.....	480.00
Enter approximately 600 names and	
addresses (with phone number) in	
upper and lower case into database.	
Merge with tapes to be personalized	
@ \$0.25/ea.....	150.00
Produce 9-track tape of database	
contents.....	50.00
Typesetting, as required, should	
not exceed.....	200.00
Shipping charges.....	as incurred
Courier charges @ \$15.00/trip.....	as required
Convert to merge format (adding	
MAIL-KEY); create MATCH-CODE and	
load into one file; sort by	
ZIP/MATCH-CODE/MAIL-KEY; remove	
duplicates and make tape file 105,060	
@ 0.02/each.....	2,101.20
Re-sort by PHONE/ZIP/NAME and print	
roster 105,060 @ 0.02/each.....	2,101.20
Convert to upper and lower case	
81,124 @ 0.01/each.....	811.24
Label, live stamp, insert, sort, tie,	
bag and mail 105,000 pieces	
@ \$18.00/E.....	1,890.00
Fold 105,000 pieces @ \$3.00/E/item.....	325.00
Postage 105,000 pieces	
@ \$0.11/ea.....	\$11,550.00
	=====
TOTAL	\$30,832.13



- 3 -

Final price of job to be determined by time required to process final tapes that arrived late plus overtime laser printing cost for weekend scheduling.

Metrolabels, Inc. requires an advance of ~~\$10,973.49~~ ^{PD} plus advance postage, for a total advance of \$22,523.49. Balance due within 10 of job completion. Upon receipt of deposit, we will continue production as scheduled. ^{PD}

If this meets with your approval, please sign one copy and return to Metrolabels.

*should not
\$308.64*

Signed: _____

Date: _____

Sincerely,

W.H. Taylor Gilmour

W.H. Taylor Gilmour
Vice Pres., Marketing

WHTG/cs

8 6 0 4 0 5 6 5 4 5 6

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

INVOICE NUMBER: DW-301-83

DATE: 1-30-84

TO: Conservative Commemorative Society
26555 Evergreen Rd. Suite 1116
Southfield, Mi., 48076

Description	Quantity	\$ Per M.	Extension
Doctors at Home address	10,424	40.00	416.96
EPACO's Conservatives	10,000	75.00	750.00
Lobbyists	8,314	35.00	290.99
Collectors Media	5,000	45.00	225.00
National Review	10,000	100.00	1,000.00
Medalic Arts	43,936	N/C	N/C
CFR	1,787	200.00	357.40
Campaign For the 80's	5,000	60.00	300.00
Human events	5,000	100.00	500.00
Thompson Special Select	5,000	80.00	400.00
SUBTOTAL			4,240.35
2nd Run			
Copies			
Press. labels			
Nth Name			
State counts			
SCF Coding			
Key Coding			
Title address			
Telephone numbers	18,314	10.00	183.14
3 x 5 cards			
MAG Tape	10	20.00	200.00
Other			
Shipping			76.51
SUBTOTAL			4,700.00
TOTAL			
Tax			
Invoice TOTAL			
Deposit Received			(\$4,700.00)
Amount Due			-0-

* Please include Tax I.D. No. if exempt.

Please see reverse side.

86040565457



TAPE/CODE ROSTER

CODE	SOURCE	DESCRIPTION
-----	-----	-----
USA01	CPS DATA	CP82 FOR CONSERVATIVE COMMEMORATIVE SOCIETY
USA02	CPS DATA	NATIONAL REVIEW FOR ML
USA03	CPS DATA	HUMAN EVENTS ACTS FOR ML
USA04	DUNHILL INT'L LIST CO	DOCTORS
USA05	DOMINION DP INC	LOBBYIST - NO WOMEN
USA06	WILAND & ASSOC INC	THOMPSONS SPECIAL SELECT
USA07	WILAND & ASSOC INC	FCM SPECIAL CONSERVATIVES W/PHONES
USA08	DUNHILL OF WASHINGTON	REGAN COMMEMORATIVE STATUETTE & MEDALLION
USA09*	C & L DATA SYSTEMS	MEDALLIC ART
USA10	TROXLER	TROXLER HOUSE LIST (DATABASE)
USA12	C & G DATA INC	C & G DATA INC
USA13*	C & L DATA SYSTEMS	MEDALLIC ART

* FROM SAME SOURCE TAPE

NOTE: THERE IS NO CODE USA11

DW-301-83

ORDER FORM

Date: 10-20-83

(Please Print)

Name Brant Turner Title _____ Phone No. (____) _____

Company Dunhill of Washington

Street 1990 M. St. N.W. suite 570

City Washington D.C. State _____ Zip 20036

Ship Completed Job To: (If Different)
Metulabels, INC
512 Maple Ave West
Vienna, Va. 22180
Ann Taylor Gilmore

QUANTITY	LIST NAME	PRICE PER M	TOTAL PRICE
10,000	Doctors @ Home Address Choose those with telephones - <u>Keep Record - Provide Phones</u> <u>Key Code - A4</u>		
		Minimum Shipping Charges	\$7.50
		Fla. / N.Y. Sales Tax	

MINIMUM ORDER \$200.00 * Full payment required in advance from unrated firms.
 Terms are net cash 30 days. Bank references required for open account.

Total Enclosed \$ _____

GEOGRAPHICAL COVERAGE ☐ All States ☒ Cross Section ☐ States Checked ☐ Nth Name (Random) - add \$2.00/M	MATERIAL ☐ Gummed Labels - add \$2.50/M ☐ Cheshire (Machine Affixable) - no charge ☐ Pressure Sensitive (Peel & Stick) - add \$6.00 ☐ 3 x 5 Cards - add \$17.50/M ☒ Mag Tape TR 9 BPI 1600	ADDITIONAL SELECTIONS ☐ SCF - add \$5.00/M ☐ State - add \$2.50/M ☐ Keycoding (4 digits) - add \$2.00/M ☐ Title Address - add \$2.00 ☐ Telephone Numbers - add \$10.00/M
--	--	---

Card Holder's Name (Please Print)

Card Holder's Signature



Please Check Payment Type

- ☐ Master Card
- ☐ American Express
- ☐ Visa
- ☐ Diners Club

Card No. _____

Card Valid From _____ To _____

dunhill of washington
representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST

OWNER:

James Jorg List Management
28 W. 44th Street
New York, N.Y. 10036
Attn: Ninfa Lopiccolo

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B1

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and Medalion

NAMES FROM YOUR LIST OF: "Medalic Art"

RATE PER M Running Charges
Per. Bob Belden
at Medalic Art

Mail order Buyers

Volume

All 43,936

☐ CHESHIRE LABELS

☐ GUMMED LABELS

☐ PRESSURE SENSITIVE LABELS

☒ MAGNETIC TAPE TR 9 BPI 1600

☐ 3X5 CARDS

☐ TEST (good cross section of file)

☐ TEST

☐ COMPLETE USE

☐ CONTINUATION . . . omit previously
furnished names

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave. West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship via Air Express to expedite

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

DW-301-83

ORDER FORM

Date: 10-20-83

(Please Print)

Name Brant Turner

Title _____

Phone No. () _____

Company Dunhill of WashingtonStreet 1990 M. St. N.W. suite 570City Washington D.C.

State _____

Zip 20036

Ship Completed Job To: (If Different)

Metulabels INC
512 Maple Ave West
Vienna, Va. 22180
Ann Taylor Gilmore

QUANTITY	LIST NAME	PRICE PER M	TOTAL PRICE
10,000	<u>Doctors @ Home Address</u> <u>Choose those with telephones -</u> <u>Keep Record - Provide Phones</u> <u>Key Code - A4</u>		
		Minimum Shipping Charges	\$7.50
		Fla. / N.Y. Sales Tax	

MINIMUM ORDER \$200.00* Full payment required in advance from unrated firms.
 Terms are net cash 30 days. Bank references required for open account.

Total Enclosed* \$

GEOGRAPHICAL COVERAGE

- ☐ All States
☒ Cross Section
☐ States Checked
☐ Nth Name (Random) - add \$2.00/M

MATERIAL

- ☐ Gummed Labels - add \$2.50/M
☐ Cheshire (Machine Affixable) - no charge
☐ Pressure Sensitive (Peel & Stick) - add \$6.00?
☐ 3 x 5 Cards - add \$17.50/M
☒ Mag Tape TR 9 BPI 1600

ADDITIONAL SELECTIONS

- ☐ SCF - add \$5.00/M
☐ State - add \$2.50/M
☐ Keycoding (4 digits) - add \$2.00/M
☐ Title Address - add \$2.00
☐ Telephone Numbers - add \$10.00/M

Card Holder's Name (Please Print)

Card Holder's Signature



Please Check Payment Type

- ☐ Master Card
☐ American Express
☐ Visa
☐ Diners Club

Card No. _____

Card Valid From _____ To _____

dunhill of washington
representative for dunhill international list co., inc.

1890 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

Jami List Management
275 Forest Ave.
LIST Paramus, N.J. 07652
OWNER: Attn: Donna

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B3

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medallion

NAMES FROM YOUR LIST OF: "American Collector" RATE PER M 55.00

Subscribers

5,000 nth select Keep record

☐ CHESHIRE LABELS

☐ GUMMED LABELS

☐ PRESSURE SENSITIVE LABELS

☒ MAGNETIC TAPE TR 9 BPI 1600

☐ 3X5 CARDS

☒ TEST (good cross section of file)

☐ TEST

☐ COMPLETE USE

☐ CONTINUATION ... omit previously
furnished names

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed

Ship via Air Express to expedite

Please call Dunhill to confirm tape Specifications

SHIP TO:

Metrolabels Inc.
512 Maple Ave. West
Vienna, VA 22180
Attn: Taylor Gilmour

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

dunhill of washington
representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST OWNER: Jami List Management
275 Forest Ave.
Paramus, N.J. 07652
Attn: Donna

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code B2

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: Coin Country RATE PER M 55.00

Collectors

5,000 nth select Keep record

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave., West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed

Ship via Air Express to expedite
Please call Dunhill to Confirm tape specifications

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

REQUEST FORM

The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.

	Each	Quantity	Sub-Total
* Great Eagle Sculpture	\$1050	_____	_____
* GOP Elephant Sculpture	650	_____	_____
* Gold medallion	950	_____	_____
* Silver medallion	95	_____	_____
* Bronze medallion	35	_____	_____
		TOTAL\$	=====

Complementary Gifts:

_____ *A Time for Choosing*

_____ *Along With's Trail*

_____ Both, I requested several commemoratives for the January 20th signing

_____ Additional books are available on request

So that we may personalize your commemorative correctly, please write the name clearly:

Make checks payable to:

Conservative Commemorative Society

I enclose my check for \$ _____

Charge my account instead: ☐ VISA
☐ MASTERCARD

Account # _____ Exp. Date _____

Name _____

Address _____

City _____ State _____ Zip _____

Signature _____

(Not valid unless signed)

dunhill of washington

representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

ORDER CONFIRMATION

✓
Fred Woolf List Company
280 N. Central Ave.
LIST Hartsdale, N.Y. 10530
OWNER: Attn: Eileen

✓ Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

✓ Key No. Key Code C1

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "Lobbyists" RATE PER M 35.00
10.00 phones

Count 8,000 All except women Lobbyists
include telephone numbers

- 12
6
4
5
0
☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☐ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION ... omit previously
furnished names _____

✓ REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

6 MAIL DATE: 11-15-83

8 SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship via Air Express to expedite

SHIP TO:

✓
Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour
✓

✓
mail check
10-31-83
\$346.69
✓

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

Dunhill of Washington
representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST
OWNER:

Rubin Response Management
3315 W. Algonguin Road
Rolling Meadows, IL 60008

Attn: Lynn

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code A1

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "Citizens for the Republic" RATE PER M 45.00
Donors File
50,000 Top Donors
by Contribution if Possible

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE:

SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship via Air Express
Please call to confirm tape Specifications

MA:td Clerk
\$1835.00
10-31-87

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

Dunhill of Washington
representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST OWNER: Ultra Arts
150 E. 35th St.
New York, N.Y. 10016
Attn: Bob Jenkins

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code A3

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: "National Review" Subscribers RATE PER M 100.00
Actives individuals
10,000 min test
keep record

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names _____

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

Metrolabels Inc.
512 Maple Ave., West
Vienna, VA 22180

SHIP TO:

Attn: Taylor Gilmour

MAIL DATE: 11-25-83

SPECIAL INSTRUCTIONS:

Sample Enclosed Also Prepayment
Ship via Air Express to expedite

Please call Dunhill to Confirm tape Specifications

Mailed Check
1008.00
10-31-83

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in-sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

dunhill of Washington
representative for dunhill International list co., Inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

**LIST
OWNER:**

Response Dynamics
2070 Chain Bridge Road, Suite 380
Vienna, VA 22180
Attn: Dave Kunko

Date 10-21-83

Dunhill's Order No. DW-301-83

Mailer's Order No.

Key No. Key Code

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and Medalion

NAMES FROM YOUR LIST OF: American For Reagan Agenda **RATE PER M** Running Char
Donors per ARA
10,000 nth select Keep record Gary Van Bus

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☐ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION . . . omit previously
furnished names

REQUESTED DELIVERY:
(If material does not arrive on schedule,
please notify us.)

MAIL DATE:

SPECIAL INSTRUCTIONS:

SAMPLE ENCLOSED
SHIP VIA AIR EXPRESS TO EXPEDITE

SHIP TO:

Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

PLEASE CALL TO CONFIRM TAPE SPECIFICATIONS

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

dunhill of washington

representative for dunhill international list co., inc.

1990 M St., N.W., Suite 570 / Washington, DC 20036
(202) 331-7724

LIST ORDER

LIST OWNER: EPACO
7205 Lockport Pl.
Lorton, VA 22079
Attn: Don Hiner

Date 10-21-83

Dunhill's Order No.

Mailer's Order No.

Key No. Key Code A5

MAILER: Conservative Commemorative Society

OFFER: Reagan Commemorative Statuette and medalion

NAMES FROM YOUR LIST OF: EPACO's Best Conservative RATE PER M 75.00
Special Hotline \$250.00
Contribution choose names with Telephones
nth select 10,000 volume
Keep record for later telephone select

- ☐ CHESHIRE LABELS
☐ GUMMED LABELS
☐ PRESSURE SENSITIVE LABELS
☒ MAGNETIC TAPE TR 9 BPI 1600
☐ 3X5 CARDS

- ☒ TEST (good cross section of file)
☐ TEST
☐ COMPLETE USE
☐ CONTINUATION... omit previously
furnished names _____

REQUESTED DELIVERY:

(If material does not arrive on schedule,
please notify us.)

SHIP TO:

Metrolabels Inc.
512 Maple Ave, West
Vienna, VA 22180
Attn: Taylor Gilmour

MAIL DATE: 11-25-83

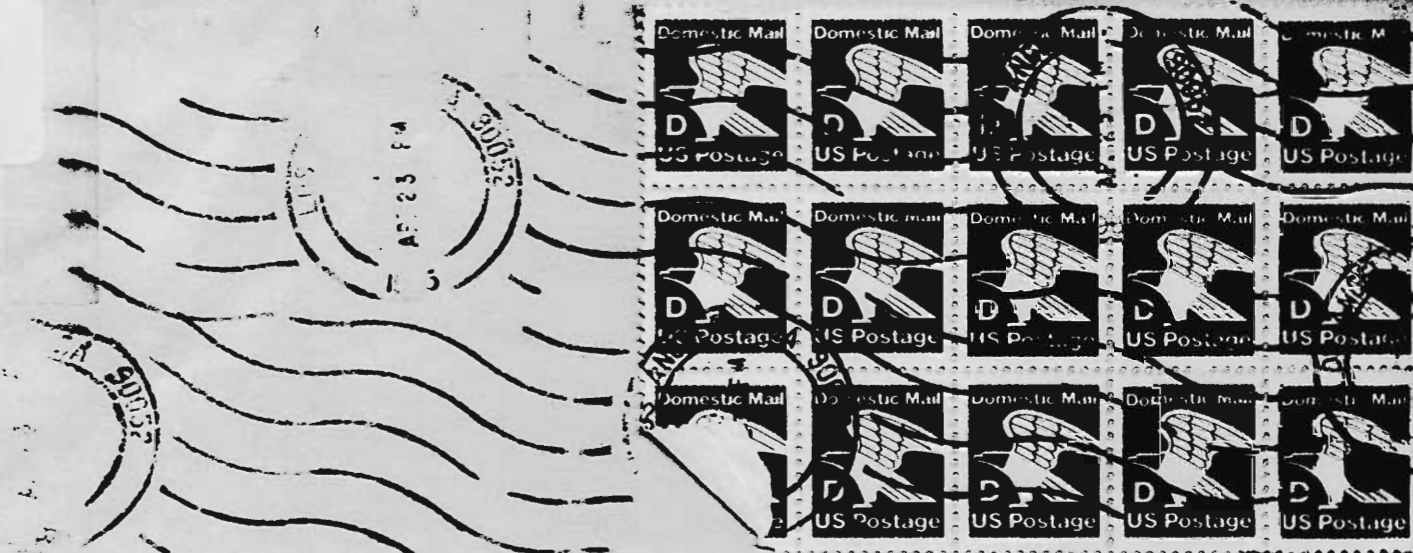
SPECIAL INSTRUCTIONS:

Sample Enclosed
Ship Via Air Express to expedite
Please Call to Confirm Tape Specifications!

1. We understand that this is a one-time rental. No copy of the names is to be made without the consent of the list owner.
2. Please record names used so they can be omitted on next order.
3. List must be zip coded and in sequence for 3rd class bulk mailing. Advise if you cannot supply.
4. Dunhill List Co. will bill mailer in your behalf and remit the amount, less brokerage commission, upon receipt of payment.

William Prosser
0 Glendon Ave Suite 11
Angeles, CA 90024

8 6 0 4 0 5 6 5 4 7 0



Mr. Matt Gerson
Federal Elections Commission
Washington DC 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 23, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Troxler
c/o Image Star
1730 Glendon
Suite 11
Los Angeles, California 90024

Dear Mr. Troxler:

On October 23, 1984, the Federal Election Commission instituted a compliance action and subsequently found reason to believe that you, Great Through '88 and you, as treasurer, and the Conservative Commemorative Society, Inc. and you, as Director, violated certain sections of the Federal Election Campaign Act of 1971, as amended. On October 26, 1984, the Commission sent you a letter notifying you of those findings. That letter included a list of questions.

Upon further review of the information available to the Commission, and the generally unresponsive answers provided by you, the Commission, on March 12, 1985, issued a Subpoena and Order for the Production of Documents. On March 20, 1985, the Commission attempted to deliver that Subpoena and Order to you at: 1549 35th Street, N.W., Washington, D.C. 20007. Enclosed herewith please find a copy of the March 20, 1985 letter.

If the General Counsel's Office does not hear from you within fifteen (15) days of the date that this letter is postmarked, the Office will recommend to the Commission that it proceed to the United States District Court to enforce the Subpoena and Order.

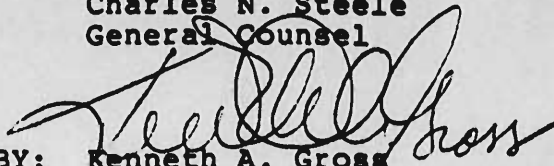
86040565471

L. William Troxler
Page 2

If you have any questions, please direct them to Matt Gerson
at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
March 20, 1985 letter from Kenneth A. Gross to
L. William Troxler
Subpoena and Order

8604055472



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 20, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Troxler, Director
The Conservative Commemorative
Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Commission determined that the Conservative Commemorative Society, Inc. ("Society") together with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, the Commission found that Great Through '88 and you as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration and that the Society with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Commission found that Great Through '88 and you as treasurer of Great Through '88, as well as the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

An investigation of this matter is being conducted and additional information is needed from you as director of the Conservative Commemorative Society, Inc. Consequently, the Federal Election Commission issued the attached subpoena and order which requires you to provide information that will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

86040565473

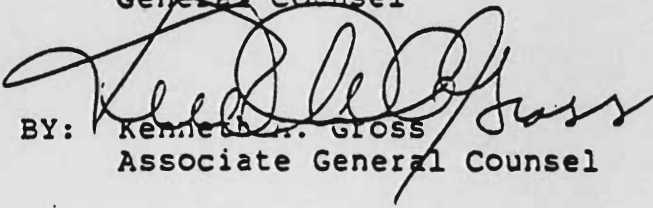
The Conservative Commemorative Society
Page 2

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, it is required that you submit the information under oath and that you do so within fifteen (15) days of your receipt of this subpoena and order.

If you have any questions, please direct them to Matt Gerson, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY:  Kenneth R. Gross
Associate General Counsel

Enclosure
Subpoena and Order

36040565474

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of :

The Conservative Commemorative
Society, Inc.

L. William Troxler, Director
Great Through '88
L. William Troxler, Treasurer

)
)
) MUR 1834
)
)
)
)
)

SUBPOENA AND ORDER FOR THE
PRODUCTION OF DOCUMENTS

To: L. William Troxler, Director
The Conservative Commemorative Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas certain books, records, memoranda and other written materials in your possession which pertain to commercial transactions of the Conservative Commemorative Society, Inc. that may relate to the establishment and operation of Great Through '88.

You are hereby ordered to provide the following:

1. All originals, or duplicate and complete copies, of all direct mail, magazine and other solicitations utilized by the Conservative Commemorative Society, Inc., in its effort to sell the Great Eagle Medallion Sculpture.
2. All documents and materials concerning the purchase of each mailing list referred to by L. William Troxler at page three, number 12 of his October 31, 1984 response to the Commission.

8604055475

3. All documents and materials concerning any other list of persons solicited by the Commemorative Society, Inc. and specifically identifying the list which contained the following addressee:

Fred Fielding
W.H.O.
2nd Floor
Executive Office of the President
Washington, D.C.

4. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed by the Conservative Commemorative Society, Inc. with the Medallic Art Company of Connecticut, the purported manufacturer of the Great Eagle Medallic Sculpture.
5. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed with the Conservative Commemorative Society, Inc. by individuals or entities interested in purchasing the Great Eagle Medallic Sculptures.
6. All the Reports of Receipts and Disbursements that Great Through 1888 filed pursuant to 2 U.S.C. § 434(a)(4), if these reports exist.

Definitions

As used in this Subpoena and Order, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is

86040565476

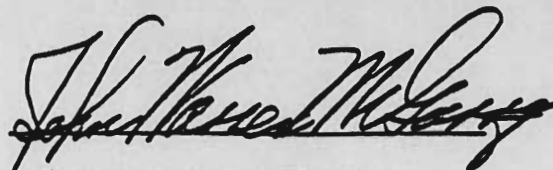
transmitted or stored including the original, all copies, and drafts of writings of any kind, and printed, visual, or electronic materials to be produced with regard to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, related to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from October 14, 1983, up to and including December 31, 1984, unless otherwise specified.
4. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

86040565477

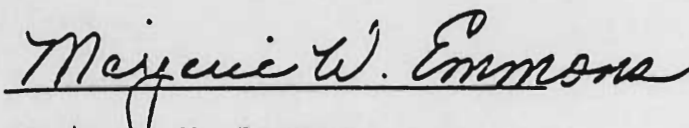
WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 19th day
of March 1985.



John Warren McGarry

Chairman

ATTEST:



Marjorie W. Emmons

Secretary to the Commission

86040565478



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Troxler, Director
The Conservative Commemorative
Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Commission determined that the Conservative Commemorative Society, Inc. ("Society") together with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, the Commission found that Great Through '88 and you as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration and that the Society with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Commission found that Great Through '88 and you as treasurer of Great Through '88, as well as the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

An investigation of this matter is being conducted and additional information is needed from you as director of the Conservative Commemorative Society, Inc. Consequently, the Federal Election Commission issued the attached subpoena and order which requires you to provide information that will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

36040565479

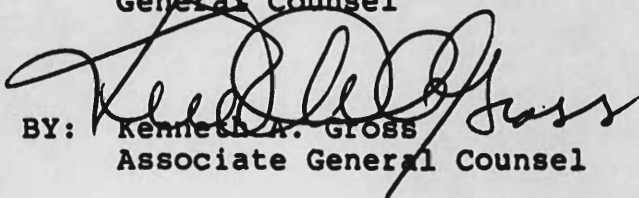
The Conservative Commemorative Society
Page 2

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, it is required that you submit the information under oath and that you do so within fifteen (15) days of your receipt of this subpoena and order.

If you have any questions, please direct them to Matt Gerson, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order

8604055430

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

The Conservative Commemorative
Society, Inc.

L. William Troxler, Director
Great Through '88

L. William Troxler, Treasurer

)
)
) MUR 1834
)
)
)
)
)

SUBPOENA AND ORDER FOR THE
PRODUCTION OF DOCUMENTS

To: L. William Troxler, Director
The Conservative Commemorative Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

860455431
PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas certain books, records, memoranda and other written materials in your possession which pertain to commercial transactions of the Conservative Commemorative Society, Inc. that may relate to the establishment and operation of Great Through '88.

You are hereby ordered to provide the following:

1. All originals, or duplicate and complete copies, of all direct mail, magazine and other solicitations utilized by the Conservative Commemorative Society, Inc., in its effort to sell the Great Eagle Medallion Sculpture.
2. All documents and materials concerning the purchase of each mailing list referred to by L. William Troxler at page three, number 12 of his October 31, 1984 response to the Commission.

3. All documents and materials concerning any other list of persons solicited by the Commemorative Society, Inc. and specifically identifying the list which contained the following addressee:

Fred Fielding
W.H.O.
2nd Floor
Executive Office of the President
Washington, D.C.

4. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed by the Conservative Commemorative Society, Inc. with the Medalllic Art Company of Connecticut, the purported manufacturer of the Great Eagle Medalllic Sculpture.
5. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed with the Conservative Commemorative Society, Inc. by individuals or entities interested in purchasing the Great Eagle Medalllic Sculptures.
6. All the Reports of Receipts and Disbursements that Great Through '88 filed pursuant to 2 U.S.C. § 434(a)(4), if these reports exist.

Definitions

As used in this Subpoena and Order, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is

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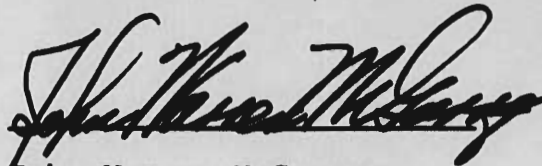
transmitted or stored including the original, all copies, and drafts of writings of any kind, and printed, visual, or electronic materials to be produced with regard to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, related to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from October 14, 1983, up to and including December 31, 1984, unless otherwise specified.
4. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

3601055433

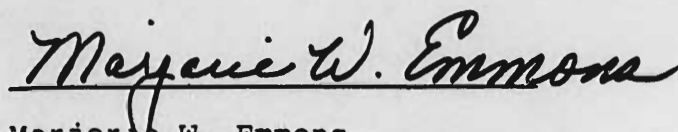
WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 19th day
of March 1985.



John Warren McGarry

Chairman

ATTEST:



Marjorie W. Emmons

Secretary to the Commission

86040565434



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JODY C. RANSOM

DATE :

MARCH 19, 1985

SUBJECT:

MUR 1834 - Subpoena and Order

The attached subpoena and order was Commission approved on March 12, 1985 by a vote of 5-0. It has been signed and sealed this date.

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

The Conservative Commemorative)
Society, Inc.)

L. William Troxler, Director)
Great Through '88)

L. William Troxler, Treasurer)

MUR 1834

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of March 12,
1985, do hereby certify that the Commission decided by a
vote of 5-0 to take the following actions in MUR 1834:

1. Authorize the Subpoena and Order for the
Production of Documents to L. William
Troxler, as recommended in the General
Counsel's report dated March 6, 1985.
2. Approve the letter attached to the
General Counsel's report dated
March 6, 1985.

Commissioners Aikens, Elliott, Harris, McGarry, and
Reiche voted affirmatively for the decision; Commissioner
McDonald was not present at the time of the vote.

Attest:

3-12-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
SECRETARY

In the Matter of)
The Conservative Commemorative)
Society, Inc.)
L. William Troxler, Director)
Great Through '88)
L. William Troxler, Treasurer)

05 MAR 6 12:04
MUR 1834

SENSITIVE

GENERAL COUNSEL'S REPORT

On October 23, 1984, the Commission instituted a compliance action and found reason to believe that the Conservative Commemorative Society, Inc. (hereinafter "Society") together with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, the Commission found reason to believe that Great Through '88 and L. William Troxler as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration, and that the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Commission found reason to believe that Great Through '88 and L. William Troxler, as treasurer of Great Through '88, as well as the Society, violated

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2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

On October 26, 1984, the Commission sent Mr. Troxler a letter notifying him of these findings. That letter included a list of questions. See Attachment 1. On November 13, 1984, this Office received a response from Mr. Troxler; the response addressed the Commission's findings as well as this Office's questions. However, Mr. Troxler's answers were generally unresponsive. See Attachment 2.

While the Respondent has provided some information, we believe additional information is necessary before this investigation can be completed. It appears that any future request for information should be in the form of a Subpoena and Order. Accordingly, the General Counsel's Office recommends that the Commission authorize a Subpoena and Order for the production of certain books, records, memoranda and other written materials which pertain to certain commercial transactions of the Conservative Commemorative Society, Inc. and the operation of Great Through '88.

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Recommendations

The Office of General Counsel recommends that the
Commission:

1. Authorize the attached Subpoena and Order for the Production of Documents to L. William Troxler; and
2. Approve the attached letter.

Charles N. Steele
General Counsel

March 6, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Questions proffered to L. William Troxler on October 26, 1984.
2. Response to those questions received by the General Counsel's Office on November 13, 1984.
3. Copy of Subpoena and Order.
4. Copy of proposed letter.

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QUESTIONS FOR L. WILLIAM TROXLER, TREASURER
GREAT THROUGH '88

1. What positions do you hold in the two (2) following entities:
 - a. Great Through '88
 - b. The Conservative Commemorative Society, Inc.
2. Are any of the above paid positions?
3. Is the Society a registered corporation? If so,
 - a. what state;
 - b. date of incorporation.
4. What is the stated legal purpose of the Society?
 - a. Please provide the Articles of Incorporation.
5. Please name and identify all officers of the Society.
6. Please name and identify all officers of Great Through '88.
7. What is the nature of the stated agency relationship between Great Through '88 and the Society?
8. Please provide copies of any contracts, agreements or other documents that explain the relationship referred to above.
9. Is Great Through '88 directly or indirectly established or maintained by a corporate entity? If so, identify the corporation.
10. What is the source of the funds that will be used to purchase the commemorative items?

Attachment 1

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Questions for L. William Troxler
Page 2

11. Who will purchase the commemorative items?
12. How did you compile your list of persons to solicit? Please state the original source of your list.
13. How will Great Through '88 receive the funds that will finance it?
14. What portion of the proceeds will be kept by the Society as commission, expenses, and/or profit?
15. Will Great Through '88 and the Society share the same bank accounts?
16. Please name the bank(s), credit union(s), and/or any other banking or financial institutions that will be used as depositories by Great Through '88 and the Society.
17. Are there any funds presently in the accounts established by Great Through '88 and the Society?

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RECEIVED AT THE FEC
GCC # 5579
84 NOV 13 9:12

L. William Troxler

ATTENTION: Conley Edwards, Jr.
RE: MUR1834

October 31, 1984

First thing we do, let's kill all the lawyers.

Shakespeare, Henry VI

Geezzus guys, what have you been smoking down there. I get this letter from my (?) government (?) in the mail, and like any good God fearing, tax-paying, salt-of-the-earth American, I try to take it seriously. But how can I?

Even if I did understand it--which I don't, and even if I had anything to hide--which I now don't know if I do or not, how could I take it seriously? Did anybody there read what you wrote? But alas, I trust you are trying to do your job, and since my tax-dollars are paying your salary, I will try to be helpful.

Do keep this confidential, I wouldn't want my mother to read about my misfortunes and, er, wrongdoings in the tabloids. I'm plunging ahead without the services of a lawyer. So, please humor me if my "responses" aren't as pettifogging and peremptorily pious as your "questions."

I am but a humble American (though less humble than young Tom Paine when he wrote to beg the forgiveness of the Crown for those crimes he perpetrated as tax collector). And I do understand, as Tom did, that it would be simple enough, though expensive, to ignore your questions. Nonetheless, I humbly submit, on Page Two, my answers to your questions.

Respectfully,
J. William Troxler

1549 35th Street, N.W., Suite One
Washington, D.C. 20007

Attachment II

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34 NOV 13 11:51
GENERAL COUNCIL

- 1a. I registered Great Through '88 but never conducted any business, and disbanded in June, 1984.
- 1b. I was President of The Conservative Commemorative Society, Inc., also disbanded in June, 1984.
2. Both were done in honor to country, no compensation received. Hard to believe? Well, folk like me do exist out there.
- 3a. Michigan.
- 3b. August 29, 1983
4. To produce political commemorative keepsakes.
- 4a. Attached.
5. See Articles of Incorporation, still attached.
6. Just me, folks.
7. All proceeds from the sales of the commemoratives by the Society were to go to Great Through '88.
8. Everything verbal, no lawyers, just trust.
9. Nope. Not directly. Not indirectly.
10. Money with imprint, "In God We Trust."
11. Customers who trust in God and country.

Page Three

12. Made up the names myself. Okay, okay, here is the list:

<u>Company</u>	<u>List Title</u>	<u>Count</u>
EPACO	Best Conservatives	10,000
Response Dynamics	Americans for Reagan Agenda	10,000
Ultra Arts	National Review Subscribers	10,000
Rubin Response	CFTR Doners	50,000
Fred Woolf Lists	Lobbyists	8,000
Jami Lists	Coin Country Subscribers	5,000
Jami Lists	American Collector Subsc.	5,000
Dunhill Lists	Doctors	10,000
James Jorg Lists	Medallic Art Inc. Customers	43,936
Thompson Assoc.	Human Events Subscribers	5,000
Thompson Assoc.	FCM Doners	4,000
Thompson Assoc.	Thompson House File	4,000
Thompson Assoc.	Campaign '82 High-doners	5,000

13. It will not.

14. None, Society achieved negative cash flow, comprende?

15. Nope.

16. Great Through '88 has no banking account, never did, and sadly, never will. Society has an account at Michigan National Bank-Oakland.

17. None, obviously, in Great Through '88's non-existent account; negative balance in Society's.

P.S. Can I bill you for my time on this? Oh well, how 'bout them election results!

Attachment II (p-3)

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MUR 1834

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To: L. William Troxler, Director
The Conservative Commemorative Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas certain books, records, memoranda and other written materials in your possession which pertain to commercial transactions of the Conservative Commemorative Society, Inc. that may relate to the establishment and operation of Great Through '88.

You are hereby ordered to provide the following:

1. All originals, or duplicate and complete copies, of all direct mail, magazine and other solicitations utilized by the Conservative Commemorative Society, Inc., in its effort to sell the Great Eagle Medallion Sculpture.
2. All documents and materials concerning the purchase of each mailing list referred to by L. William Troxler at page three, number 12 of his October 31, 1984 response to the Commission.

3. All documents and materials concerning any other list of persons solicited by the Commemorative Society, Inc. and specifically identifying the list which contained the following addressee:

Fred Fielding
W.H.O.
2nd Floor
Executive Office of the President
Washington, D.C.

4. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed by the Conservative Commemorative Society, Inc. with the Medalllic Art Company of Connecticut, the purported manufacturer of the Great Eagle Medalllic Sculpture.
5. All documents and materials maintained by the Conservative Commemorative Society, Inc. concerning orders placed with the Conservative Commemorative Society, Inc. by individuals or entities interested in purchasing the Great Eagle Medalllic Sculptures.
6. All the Reports of Receipts and Disbursements that Great Through '88 filed pursuant to 2 U.S.C. § 434(a)(4), if these reports exist.

Definitions

As used in this Subpoena and Order, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is

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transmitted or stored including the original, all copies, and drafts of writings of any kind, and printed, visual, or electronic materials to be produced with regard to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, money orders, bank deposit slips, receipt ledgers, account ledgers, bank withdrawal slips, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, related to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any documents which may be otherwise construed to be out of its scope.
3. All requests contained herein are for information, documents and materials dating from October 14, 1983, up to and including December 31, 1984, unless otherwise specified.
4. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. within fifteen (15) days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

86040565497

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this _____ day
of _____ 1985.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8604055498



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Troxler, Director
The Conservative Commemorative
Society, Inc.
1549 35th Street, N.W.
Suite One
Washington, D.C. 20007

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Commission determined that the Conservative Commemorative Society, Inc. ("Society") together with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, the Commission found that Great Through '88 and you as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration and that the Society with Great Through '88 and you as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Commission found that Great Through '88 and you as treasurer of Great Through '88, as well as the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

An investigation of this matter is being conducted and additional information is needed from you as director of the Conservative Commemorative Society, Inc. Consequently, the Federal Election Commission issued the attached subpoena and order which requires you to provide information that will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

The Conservative Commemorative Society
Page 2

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, it is required that you submit the information under oath and that you do so within fifteen (15) days of your receipt of this subpoena and order.

If you have any questions, please direct them to Matt Gerson, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order

3604055500

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GCC # 5579
84 NOV 13 49:12

L. William Troxler

ATTENTION: Conley Edwards, Jr.
RE: MUR1834

October 31, 1984

First thing we do, let's kill all the lawyers.

Shakespeare, Henry VI

Geezzus guys, what have you been smoking down there. I get this letter from my (?) government (?) in the mail, and like any good God fearing, tax-paying, salt-of-the-earth American, I try to take it seriously. But how can I?

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Do keep this confidential, I wouldn't want my mother to read about my misfortunes and, er, wrongdoings in the tabloids. I'm plunging ahead without the services of a lawyer. So, please humor me if my "responses" aren't as pettifogging and peremptorily pious as your "questions."

I am but a humble American (though less humble than young Tom Paine when he wrote to beg the forgiveness of the Crown for those crimes he perpetrated as tax collector). And I do understand, as Tom did, that it would be simple enough, though expensive, to ignore your questions. Nonetheless, I humbly submit, on Page Two, my answers to your questions.

*Respectfully,
J. William Troxler*

1549 35th Street, N.W., Suite One
Washington, D.C. 20007

Responses by L. William Troxler to
Questions for L. William Troxler from
Somebody at the Federal Elections Commission
On behalf of Chairman Lee Ann Elliott,
Honorable I presume

- 1a. I registered Great Through '88 but never conducted any business, and disbanded in June, 1984.
- 1b. I was President of The Conservative Commemorative Society, Inc., also disbanded in June, 1984.
2. Both were done in honor to country, no compensation received. Hard to believe? Well, folk like me do exist out there.
- 3a. Michigan.
- 3b. August 29, 1983
4. To produce political commemorative keepsakes.
- 4a. Attached.
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Page Three

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Ultra Arts	National Review Subscribers	10,000
Rubin Response	CFTR Doners	50,000
Fred Woolf Lists	Lobbyists	8,000
Jami Lists	Coin Country Subscribers	5,000
Jami Lists	American Collector Subsc.	5,000
Dunhill Lists	Doctors	10,000
James Jorg Lists	Medallic Art Inc. Customers	43,936
Thompson Assoc.	Human Events Subscribers	5,000
Thompson Assoc.	FCM Doners	4,000
Thompson Assoc.	Thompson House File	4,000
Thompson Assoc.	Campaign '82 High-doners	5,000

13. It will not.

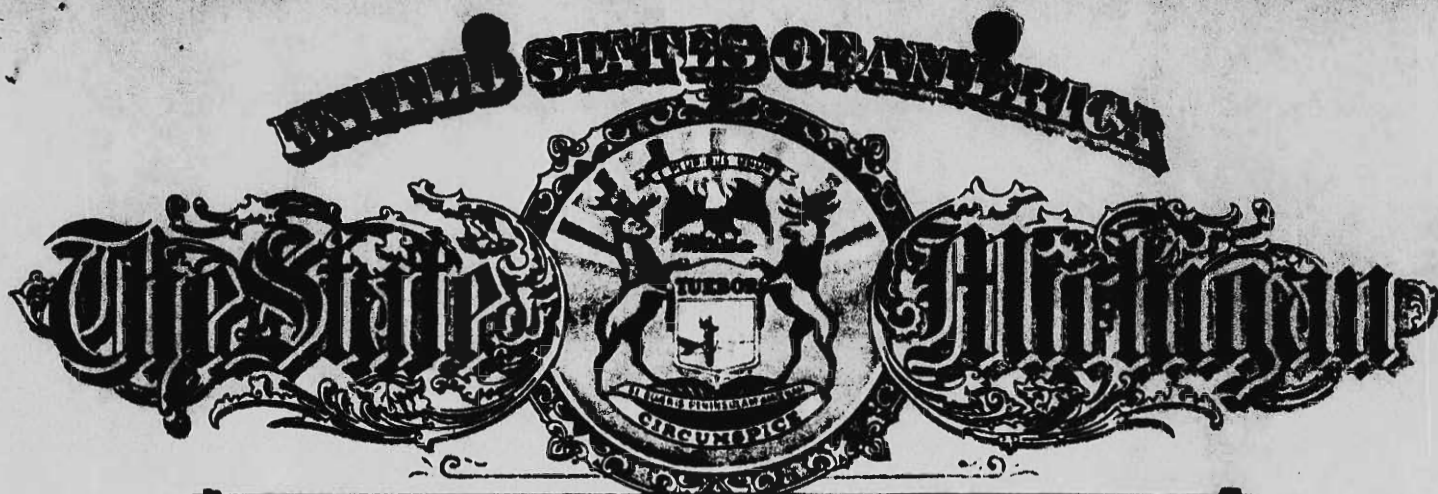
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17. None, obviously, in Great Through '88's non-existent account; negative balance in Society's.

P.S. Can I bill you for my time on this? Oh well, how 'bout them election results!



Michigan Department of Commerce

Lansing, Michigan

8604055594
This is to Certify That Articles of Incorporation of

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

were duly filed in this office on the 29th day of August, 1983,
in conformity with Act 284, Public Acts of 1972, as amended.

*In testimony whereof, I have hereunto set my
hand and affixed the Seal of the Department,
in the City of Lansing, this 29th day
of August, 1983*

R. A. Nelson
Director

MICHIGAN DEPARTMENT OF COMMERCE — CORPORATION AND SECURITIES BUREAU

(FOR BUREAU USE ONLY)

FILED

Date Received

AUG 29 1983

Administrator
MICHIGAN DEPARTMENT OF COMMERCE
Corporation & Securities Bureau

AUG 23 1983

EFFECTIVE DATE:

CORPORATION IDENTIFICATION NUMBER

287-412

ARTICLES OF INCORPORATION

For use by Domestic Profit Corporations

(Please read instructions on last page before completing form)

Pursuant to the provisions of Act 284, Public Acts of 1972, as amended, the undersigned corporation executes the following Articles:

Article I

The name of the corporation is:

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

Article II

The purpose or purposes for which the corporation is organized is to engage in any activity within the purposes for which corporations may be organized under the Business Corporation Act of Michigan.

Article III

The total authorized capital stock is:

Common Shares 50,000 Par Value Per Share \$ 1.00

1. Preferred Shares _____ Par Value Per Share \$ _____

and/or shares without par value as follows:

Common Shares _____ Stated Value Per Share \$ _____

2. Preferred Shares _____ Stated Value Per Share \$ _____

3. A statement of all or any of the relative rights, preferences and limitations of the shares of each class is as follows:

None

[Handwritten signature]

Article IV

1. The address of the/registered office is:

26555 Evergreen Road, Suite 1116

(Street Address)

Southfield

(City)

Michigan

48076

(ZIP Code)

2. The mailing address of the registered office if different than above:

(P.O. Box)

initial

(City)

Michigan

(ZIP Code)

3. The name of the/resident agent at the registered office is: Philip B. Fischer

Article V

The name(s) and address(es) of the incorporator(s) is (are) as follows:

Name

Residence or Business Address

L. William Troxler

26555 Evergreen Road, Suite 1116, Southfield, MI 48076

Article VI (Optional. Delete if not applicable)

When a compromise or arrangement or a plan of reorganization of this corporation is proposed between this corporation and its creditors or any class of them or between this corporation and its shareholders or any class of them, a court of equity jurisdiction within the state, on application of this corporation or of a creditor or shareholder thereof, or on application of a receiver appointed for the corporation, may order a meeting of the creditors or class of creditors or of the shareholders or class of shareholders to be affected by the proposed compromise or arrangement or reorganization, to be summoned in such manner as the court directs. If a majority in number representing $\frac{3}{4}$ in value of the creditors or class of creditors, or of the shareholders or class of shareholders to be affected by the proposed compromise or arrangement or a reorganization, agree to a compromise or arrangement or a reorganization of this corporation as a consequence of the compromise or arrangement, the compromise or arrangement and the reorganization, if sanctioned by the court to which the application has been made, shall be binding on all the creditors or class of creditors, or on all the shareholders or class of shareholders and also on this corporation.

Article VII (Optional. Delete if not applicable)

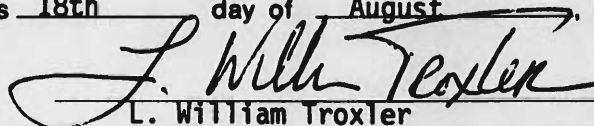
Any action required or permitted by the Act to be taken at an annual or special meeting of shareholders may be taken without a meeting, without prior notice and without a vote, if a consent in writing, setting forth the action so taken, is signed by the holders of outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take the action at a meeting at which all shares entitled to vote thereon were present and voted.

Prompt notice of the taking of the corporate action without a meeting by less than unanimous written consent shall be given to shareholders who have not consented in writing.

Use space below for additional Articles or for continuation of previous Articles. Please identify any Article being continued or added. Attach additional pages if needed.

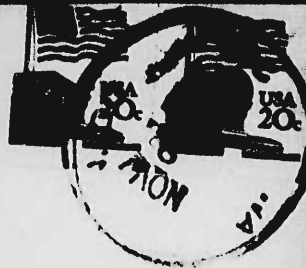
86040565507

I ~~(we)~~, the incorporator(s) sign my ~~(our)~~ name(s) this 18th day of August, 19 83.


L. William Troxler

4055500

Att: Conley Edwards, Jr
Federal Elections Commission
Washington DC, 20463



NOV 1964



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 26, 1984

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Federal Election Commission determined that there is reason to believe that the Conservative Commemorative Society, Inc. violated 2 U.S.C. § 441d(a)(3), 2 U.S.C. § 441b, and 2 U.S.C. § 438(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

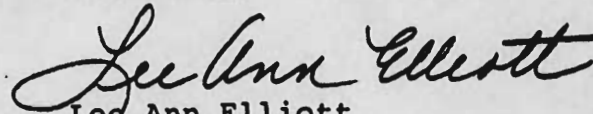
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Mr. L. William Troxler
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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360405511

RESPONDENT The Conservative Commemorative
Society, Inc.
L. William Troxler, Director

The Conservative Commemorative Society, Inc. (hereinafter "the Society") together with Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission; the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for a commercial purpose.

On October 14, 1983, this Office received an advisory opinion request from L. William Troxler. However, Mr. Troxler also withdrew his request for an advisory opinion on the same

day, stating that a new and more detailed request would be submitted at a later date. On October 20, 1983, this Office received the promised revised advisory opinion request. The request outlined a plan to raise funds for Great Through '88, an independent political committee by producing and marketing commemoratives through the Society, a corporate entity.

On November 1, 1983, this Office responded to Mr. Troxler's advisory opinion request by requesting additional information concerning his plans to produce and market commemoratives, including a book Americans for the Reagan Agenda. To date, Mr. Troxler has failed to respond to this Office's request for additional information for the sole purpose of drafting an advisory opinion pursuant to his request.

Although Mr. Troxler has failed to respond to a request for additional information, he has not failed to implement his plans to produce and market merchandise through the Society in order to finance Great Through '88's political agenda.

According to Justice and the information provided, the Society mailed solicitations on behalf of Great Through '88. The mailing is soliciting contributions for Great Through '88 and is advocating support for and the reelection of Ronald Reagan and other federal candidates. However, the Society has failed to place the required § 44ld disclaimer notice on the solicitations. Furthermore, the plan designed by Mr. Troxler to fund a political committee through a corporate entity guarantees an infusion of corporate funds that will ultimately be used in connection with a

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2 U.S.C. § 441d(a)(3) states that any person who makes

Additionally, 2 U.S.C. § 434(a)(4) requires all political committees other than authorized committees to file certain reports during the calendar year; 2 U.S.C. § 441b expressly prohibits the use of corporate funds in connection with any federal election campaign; and 2 U.S.C. § 438(a)(4) expressly prohibits the use of the statements and reports on file with the

Commission for the purpose of soliciting or for commercial purposes.

Based on the above, it appears that the Society, together with Great Through '88 and L. William Troxler as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to state the name of the person(s) and/or political entity that paid for the mailing of the political solicitations and that the solicitation is not authorized by any candidate or candidate's committee. Additionally, the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, it appears that Great Through '88 and L. William Troxler as treasurer of Great Through '88 with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes. Therefore, the Office of General Counsel recommends that reason to believe be found against the Conservative Commemorative Society, Inc.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 26, 1984

L. William Troxler, Treasurer
Great Through '88
1549 - 35th Street, N.W.
Suite One
Washington, D.C. 20007

RE: MUR 1834

Dear Mr. Troxler:

On October 23, 1984, the Federal Election Commission determined that there is reason to believe that Great Through '88 and you, as treasurer, violated 2 U.S.C. § 441d(a)(3), 2 U.S.C. § 434(a)(4), 2 U.S.C. § 441b, and 2 U.S.C. § 438(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

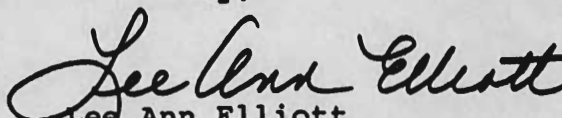
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

L. William Troxler, Treasurer
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4000.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Questions
Procedures
Designation of Counsel Statement

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1834

RESPONDENT Great Through '88
L. William Troxler, Treasurer

SUMMARY OF ALLEGATIONS

Great Through '88 and L. William Troxler, as treasurer, together with the Conservative Commemorative Society, Inc. (hereinafter "the Society") violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission; Great Through '88 and L. William Troxler, as treasurer of Great Through '88, with the Society, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, Great Through '88 and L. William, as treasurer of Great Through '88, together with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for a commercial purpose.

FACTUAL BASIS AND LEGAL ANALYSIS

On October 14, 1983, this Office received an advisory opinion request from L. William Troxler. However, Mr. Troxler also withdrew his request for an advisory opinion on the same

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day, stating that a new and more detailed request would be submitted at a later date.

On October 20, 1983, this Office received the promised revised advisory opinion request. The request outlined a plan to raise funds for Great Through '88, an independent political committee by producing and marketing commemoratives through the Society, a corporate entity.

On November 1, 1983, this Office responded to Mr. Troxler's advisory opinion request by requesting additional information concerning his plans to produce and market commemoratives, including a book Americans for the Reagan Agenda. To date, Mr. Troxler has failed to respond to this Office's request for additional information for the sole purpose of drafting an advisory opinion pursuant to his request.

Although Mr. Troxler has failed to respond to a request for additional information, he has not failed to implement his plans to produce and market merchandise through the Society in order to finance Great Through '88's political agenda.

According to Justice and the information provided, the Society mailed solicitations on behalf of Great Through '88. The mailing is soliciting contributions for Great Through '88 and is advocating support for and the reelection of Ronald Reagan and other federal candidates. However, the Society has failed to place the required § 44ld disclaimer notice on the solicitations. Additionally, Great Through '88 registered with the Commission on October 13, 1983, but to date has failed to file the required report(s) of receipts and disbursements.

2 U.S.C. § 441d(a)(3) states that any person who makes

Additionally, 2 U.S.C. § 434(a)(4) requires all political committees other than authorized committees to file certain reports during the calendar year; 2 U.S.C. § 441b expressly

prohibits the use of corporate funds in connection with any federal election campaign; and 2 U.S.C. § 438(a)(4) expressly prohibits the use of the statements and reports on file with the Commission for the purpose of soliciting or for commercial purposes.

Based on the above, it appears that the Society, together with Great Through '88 and L. William Troxler as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to state the name of the person(s) and/or political entity that paid for the mailing of the political solicitations and that the solicitation is not authorized by any candidate or candidate's committee. Additionally, Great Through '88 and L. William Troxler^{*/} as treasurer of Great Through '88, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission. Finally, Great Through '88 and L. William Troxler, as treasurer of Great Through '88, with the Society, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, it appears that Great Through '88 and L. William Troxler as treasurer of Great Through '88 with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports

^{*/} 2 U.S.C. § 434(a)(1) states:

each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report.

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on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

Questions have been prepared to ascertain the relationship of the entities because of Mr. Troxler's prominence in both. According to the Statement of Organization, Mr. Troxler is both Treasurer and Director of Great Through '88, in addition to being the Director of the Society. Therefore, the Office of General Counsel recommends that reason to believe be found against Great Through '88 and L. William Troxler as treasurer of Great Through '88.

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QUESTIONS FOR L. WILLIAM TROXLER, TREASURER
GREAT THROUGH '88

1. What positions do you hold in the two (2) following entities:
 - a. Great Through '88
 - b. The Conservative Commemorative Society, Inc.
2. Are any of the above paid positions?
3. Is the Society a registered corporation? If so,
 - a. what state;
 - b. date of incorporation.
4. What is the stated legal purpose of the Society?
 - a. Please provide the Articles of Incorporation.
5. Please name and identify all officers of the Society.
6. Please name and identify all officers of Great Through '88.
7. What is the nature of the stated agency relationship between Great Through '88 and the Society?
8. Please provide copies of any contracts, agreements or other documents that explain the relationship referred to above.
9. Is Great Through '88 directly or indirectly established or maintained by a corporate entity? If so, identify the corporation.
10. What is the source of the funds that will be used to purchase the commemorative items?

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Questions for L. William Troxler
Page 2

11. Who will purchase the commemorative items?
12. How did you compile your list of persons to solicit? Please state the original source of your list.
13. How will Great Through '88 receive the funds that will finance it?
14. What portion of the proceeds will be kept by the Society as commission, expenses, and/or profit?
15. Will Great Through '88 and the Society share the same bank accounts?
16. Please name the bank(s), credit union(s), and/or any other banking or financial institutions that will be used as depositories by Great Through '88 and the Society.
17. Are there any funds presently in the accounts established by Great Through '88 and the Society?

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Conservative Commemorative)
Society, Inc.) Pre-MUR 120
L. William Troxler, Treasurer)
Great Through '88)
L. William Troxler, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of October 23,
1984, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in the above-captioned
matter:

1. Open a Matter Under Review.
2. Find reason to believe that the Conservative
Commemorative Society violated 2 U.S.C.
§ 441d(a)(3).
3. Find reason to believe that Great Through '88
and L. William Troxler as treasurer violated
2 U.S.C. § 441d(a)(3).
4. Find reason to believe that Great Through '88
and L. William Troxler as treasurer violated
2 U.S.C. § 434(a)(4).
5. Find reason to believe that the Conservative
Commemorative Society violated 2 U.S.C. § 441b.

(continued)

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6. Find reason to believe that Great Through '88 and L. William Troxler, as treasurer, violated 2 U.S.C. § 441b.
7. Find reason to believe that Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 438(a)(4).
8. Find reason to believe that the Conservative Commemorative Society violated 2 U.S.C. § 438(a)(4).
9. Send the letters and questions attached to the General Counsel's report dated October 15, 1984.

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

Attest:

10-24-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

RECEIVED
FROM THE FEC
SECRETARY

SECRETARY

REPORT 15 P 2:36

Pre-MUR NO. 120
STAFF MEMBER
Conley Edwards, Jr.

On October 14, 1983, this Office received an advisory opinion request from L. William Troxler. Attachment II.

However, Mr. Troxler also withdrew his request for an advisory opinion on the same day, stating that a new and more detailed request would be submitted at a later date. Attachment III. On October 20, 1983, this Office received the revised advisory opinion request. The request outlined the following plan (Attachment IV) to raise funds for Great Through '88, an independent political committee:

... Great Through '88 proposes to raise money to make contributions to and independent expenditures on behalf of candidates for Federal office in the 1984 elections.

The agent, Conservative Commemorative Society, Inc. (the Society), will handle all phases of production and marketing of the commemoratives. All proceeds over and above the cost of sales will be forwarded to Great Through '88. The disclosure reports and books and records of Great Through '88 will reflect the full purchase price of each commemorative as the contribution amount. These reports will also reflect expenditures made by Great Through '88 to the Society, including expenditures made by Great Through '88 to the Society for production and shipping of the commemoratives to the contributor. Great Through '88 will purchase a book from a 501(c)(4) organization, Americans for the Reagan Agenda, for use as part of the commemorative offering.

On November 1, 1983, this Office responded to Mr. Troxler's advisory opinion request by requesting additional information concerning his plans to produce and market commemoratives, including a book Americans for the Reagan Agenda. Attachment V. To date, Mr. Troxler has failed to respond to this Office's request for additional information.

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Although Mr. Troxler has failed to respond to a request for additional information, he has not failed to implement his plans to produce and market merchandise through the Society in order to finance Great Through '88's political agenda.

According to Justice and the information provided, the Society mailed solicitations on behalf of Great Through '88. The mailing solicited contributions for Great Through '88 and advocates support for and the reelection of President Ronald Reagan and other federal candidates. The Society failed to place the required § 441d disclaimer notice to the solicitations.

Additionally, Great Through '88 registered with the Commission on October 13, 1983, but has failed to file the required report(s) of receipts and disbursements. Furthermore, it appears that the plan*/ designed by Mr. Troxler to fund a political committee through a corporate entity guarantees an infusion of corporate funds that will ultimately be used in connection with a federal election campaign. Finally, it appears that Mr. Troxler may have compiled a list of potential contributors and future commercial contacts from certain reports filed with the Commission. This has been determined by the language: "We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign" used in the solicitation letter (Attachment I, p. 5) mailed by the

*/ The details of this plan were outlined on page 2 of this report. Also see Attachment IV.

Society on behalf of Great Through '88. The aforesaid language seems to indicate that the addressee's name was pulled from certain reports filed with the Commission during and for the 1980 presidential election.

2 U.S.C. § 441d(a)(3) states that any person who makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee; 2 U.S.C. § 434(a)(4) requires all political committees other than authorized committees to file certain reports during the calendar year; 2 U.S.C. § 441b expressly prohibits the use of corporate funds in any federal election campaign; and 2 U.S.C. § 438(a)(4) expressly prohibits the use of the statements and reports on file with the Commission for the purpose of soliciting or for commercial purposes.

Based on the above, it appears that the Society, together with Great Through '88 and L. William Troxler as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, it appears that Great Through '88 and L. William Troxler as treasurer, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration. It also

appears that the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, it appears that Great Through '88 and L. William Troxler, as treasurer of Great Through '88, with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

Questions have been prepared to ascertain the relationship of the entities because of Mr. Troxler's prominence in both. According to the Statement of Organization, Mr. Troxler is both Treasurer and Director of Great Through '88, in addition to being the Director of the Society. Accordingly, we recommend that a compliance action be instituted in this matter.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Conservative Commemorative Society violated 2 U.S.C. § 441d(a)(3).
3. Find reason to believe that Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 441d(a)(3).
4. Find reason to believe that Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 434(a)(4).
5. Find reason to believe that the Conservative Commemorative Society violated 2 U.S.C. § 441b.
6. Find reason to believe that Great Through '88 and L. William Troxler, as treasurer violated 2 U.S.C. § 441b.

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7. Find reason to believe that Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 438(a)(4).
8. Find reason to believe that the Conservative Commemorative Society violated 2 U.S.C. § 438(a)(4).
9. Send attached letters and questions.

Charles N. Steele
General Counsel

October 15, 1984
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

Referral from Justice Department
Letter from L. William Troxler
Second Letter from L. William Troxler
Letter requesting an Advisory Opinion
Commission's Letter requesting additional information

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Washington, D.C. 20530

PM 120

APRIL 12, 1984

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele *Charlie* -

Enclosed please find a photocopy of a solicitation recently referred to our office by Fred F. Fielding, Counsel to President Ronald Reagan. A copy of Mr. Fielding's forwarding memorandum is also enclosed for your information.

The solicitation was sent over the signature of one L. William Troxler on behalf of a political committee called "Great Through '88." The mailing solicits contributions to "Great Through '88" and advocates support for the reelection of President Reagan and other federal candidates.

In light of the possible application of the notice requirement of 2 U.S.C. §441d to this communication, we are forwarding this matter to the Federal Election Commission for whatever action the Commission considers appropriate. A copy of our letter to Mr. Troxler advising him of our referral of this matter to you is also enclosed herein.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By:

Nancy S. Stewart
NANCY S. STEWART, Attorney
Public Integrity Section

Enclosures

Attachment I

Washington, D.C. 20530

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

Dear Mr. Troxler:

This is to advise that we have recently received a complaint regarding a political solicitation sent over your signature on behalf of an organization called "Great Through '88." A copy of this solicitation is enclosed herein.

The solicitation requests contributions to "Great Through '88," through the purchase of "Great Eagle Medallion Sculptures." Solicitees are advised that all proceeds above the market value of the medallions will be used by "Great Through '88" to support the reelection effort of President Ronald Reagan and the election of conservative Congressmen who support the President. The solicitation was addressed to Fred Fielding, "W H O 2nd Floor, Executive Ofc of Pres, Washington, DC," and was received by Mr. Fielding at his place of federal employment at this address.

This is to advise that Section 607 of Title 18 of the United States Code prohibits the transmission of political solicitations such as the enclosed to addresses where federal officers and employees are performing official duties. Violations of Section 607 are federal felonies, punishable by imprisonment for up to three years and a fine of up to \$5,000.

You will note that the federal character of the address to which the instant solicitation was sent is evident on the face of the solicitation.

We trust that you will take immediate and personal measures to delete this address, and all other addresses bearing indicia of a federal nature, from your solicitation lists.

Attachment I (p.2)

In addition, the Federal Election Campaign Act, 2 U.S.C. §431 et seq., requires that any communication by way of general public political mailings or advertisements which solicits contributions for a federal election, or which advocates the election of a clearly identified federal candidate, state on the face of the communication the entity who paid for or authorized the communication. 2 U.S.C. §441d. The enclosed solicitation advocates the election of President Reagan and other federal candidates, and solicits contributions toward that end, but does not appear to reflect such a notice. We have referred this aspect of the matter to the Federal Election Commission, which has civil and administrative jurisdiction over such matters. See 2 U.S.C. §437g(a) and (d).

We trust that this information will prove useful to you in any future solicitations.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

Enclosure

Attachment I(p.3)

3604055534

THE WHITE HOUSE

WASHINGTON

February 15, 1984

MEMORANDUM FOR D. LOWELL JENSEN
ACTING DEPUTY ATTORNEY GENERAL
U. S. DEPARTMENT OF JUSTICE

FROM: FRED F. FIELDING
COUNSEL TO THE PRESIDENT

SUBJECT: Solicitation From L. William Troxler

I recently received the attached letter from L. William Troxler soliciting contributions to his organization "Great Through '88." As this organization appears to be a political committee, Troxler may have violated 18 U.S.C. § 607 by sending a solicitation to my Federal office. Accordingly, I am referring this information to you for whatever action, if any, you deem appropriate.

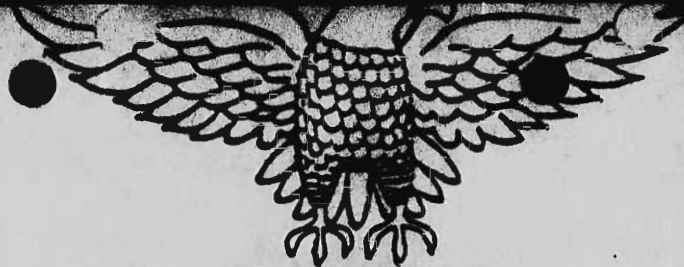
RECEIVED

MAR 26 1984

Public Integrity Section

Attachment I (p.4)

8604055535



*In Honor of
the Great Eagles
of American Society*

SAC -
Pls review
see me

1/17

Fred Fielding
W H O 2nd Floor
Executive Ofc Of Pres
Washington, DC 20500

1994384

Dear American,

::

The greatest country in the history of the world is the United States today. Family. Liberty. Prosperity.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great.

In Your honor, Great Through '88 has now authorized the historic Great Eagle Medallion Sculpture collection -- as a tribute to you.

Let me explain.

We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign. And we wish to celebrate your role as a guiding force in the American society of tomorrow.

Our on-going conservative presidential leadership offers the greatest promise for our future. President Reagan, speaking to his executive staff on January 20, 1983, said it best:

"We were sent here to move America forward again by putting people back in charge of their own country...to give individuals the opportunities to reach for their dreams."

Those of us listening to the President at that meeting were inspired to form Great Through '88, so that we all could contribute our most, and best, again. Along with the Conservative Commemorative Society, we've launched an ambitious and long-overdue undertaking.

We have authorized a unique collection of high-relief art medallions presented on hand carved mahogany sculptures -- as a tribute to you and to President Reagan.

Congratulations Great Eagle!

Attachment I (p. 5)

You should know that all proceeds from this limited issue go to support Ronald Reagan's reelection drive, and to help elect conservative Congressmen who support the President. Therefore, contributions may qualify for a tax credit.

The enclosed brochure illustrates the collection in detail.

In case you're curious, the idea for the collection was born from Ronald Reagan's love of the outdoors as a woodsman.

The centerpiece of it all is the Great Eagle Medallion Sculpture. The acronym, GEMS, is really quite fitting -- for they are superb gems.

Your official Medal of Honor is offered in 14-karat gold, fine silver, or bronze -- your choice. It is minted by Medallic Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the Medal of Honor are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

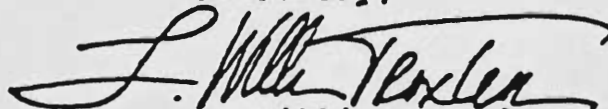
To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4484 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the foot of the Sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,


L. William Troxler
Director

11 JAN 21 1988

P.S. Remember, proceeds go toward making Ronald Reagan the first successful two-term President since Dwight D. Eisenhower. Remember too, order by January 20th for a personalized edition and complimentary books.

Attachment I (p. 6)

The Great Eagle Medallion Sculpture

The American Eagle Sculpture and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.

The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

Six Ways The Great Eagle Medallion Sculpture Will Delight the Connoisseur

An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions

REQUEST DETAILS

PHONE ORDERS: It's the easiest way to order. Just pick up the phone and call toll free during business hours — 800 435-4484. In Illinois call 800 892-6990 Ext 264. Thank you for only making credit card orders over the phone. Our customer service representative will be happy to answer your questions and take your suggestions.

	Each
* Great Eagle Sculpture	\$1050
* GOP Elephant Sculpture	650
* Gold medallion	950
* Silver medallion	95
* Bronze medallion	35

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.



An Exceptional Precedent in Commemorative Art



The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.



OFFICIAL SPECIFICATIONS: By arrangement with the Conservative Commemorative Society, gold and silver medallions are strictly limited, serially numbered and authenticated. These high-relief medallions include a protective display case. The 14KT gold art medal is 1 1/2" in diameter and contains approximately 1 1/2 troy ounces of gold. Gold edition limit: 500. The silver art medal is .999 fine, also 1 1/2", and contains approximately 1 1/4 troy ounces of silver. Silver edition limit: 1500. The bronze is 2 3/4", hand rubbed to a rich antique patina. The sculptures are hand-carved in America from solid mahogany. The Great Eagle is 18" tall with a 24" wingspan. The GOP

lit

Attachment I (p. 7)

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Consultant to the Editor

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A Bad Business

I hope some businessmen out there are listening to Arch Puddington ["Business, Labor, and the Anti-Communist Struggle," Jan. 27]. It certainly is ironic that the very bourgeoisie to which Communism is implacably hostile is so friendly to the Communists. Unfortunately, it lends credence to the charge that businessmen are basically unprincipled profit-makers. Will they be too offended by the suggestion that they follow the example of the labor unions?

Howard E. Frazer
Philadelphia, Pa.

Yellow Rags

In his article "The Media at Bay" (Dec. 23), William F. Rickesacker cites Irving Kristol's reference to the decline in standards of the highbrow press after World War II as formal education shifted in a more job-oriented direction. Toyne saw a cause-and-effect relation between the introduction of universal primary education in England in the mid-nineteenth century and the emergence of the yellow press in the next generation.

If the yellow press has folded and the highbrow press has taken a middle position to fill the gap, isn't it just possible, in a country in which a significant percentage of high-school students today couldn't locate Paris or Moscow on a world map, that in another twenty years we will have come full circle, with a press on average like the worst rags of the 1890s?

Daniel F. Keay Jr.
Goodwater, Ala.

Back Order

"It Says Here . . ." (Dec. 23) is priceless—and so are all the other Christmas pieces by Aloise Buckley Heath. As soon as the book containing them is back in print, I should like to order a copy.

Irma M. Zagel
Fort Wayne, Ind.

Industrial Sunrise

One omission in almost every discussion of industrial policy (cf. "Sunset for Industrial Policy" by Tom Bethell, Dec. 9) is the realization that President Reagan has already put in place a comprehensive strategy to strengthen U.S. competitiveness in world markets. This

competitive strategy is based on America's strengths—of our people, our heritage, and our system.

This strategy has several parts: creating an environment for long-term, non-inflationary economic growth; freeing business from excessive governmental regulation, which has diverted capital into nonproductive areas; encouraging steady monetary growth; equalizing the terms of trade through bilateral and multilateral agreements; strengthening our industrial base through tax policies that encourage more research, development, and innovation; revising our antitrust laws to permit mature industries to consolidate and to allow companies to conduct joint R&D; reviewing federal R&D policies to see how they can better contribute to commercial opportunities; and, finally, upgrading the curricula for primary and secondary education to produce technologically literate citizens who can sustain a "knowledge economy."

Clarence J. Brown
Deputy Secretary of Commerce
Washington, D.C.

Tom Bethell's article does a good job of describing the futility of any industrial policy based on massive bureaucratic intervention and centralized pricing.

This kind of industrial policy is based on the arrogant fallacy that bureaucrats isolated from the realities of the marketplace can pick the next generation of corporate winners and losers. This kind of policy tends to discount and distrust the innovation and entrepreneurial skill that usually characterized successful new firms and so-called sunrise industries.

Further, it tends to put a premium on grantmanship—the manipulation of the political and bureaucratic systems to maximize subsidies and protective regulations.

As a result, taxpayers are short-changed, politicians become the victims of their own unrealistic expectations, and would-be entrepreneurs face the unwelcomed prospect of subsidized competition. All of which goes to illustrate that one of the three greatest lies in the English language is: "I'm from the government and I'm here to help you."

Geoffrey E. Hale
Canadian Organization of Small Business
Toronto, Ont.

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

26555 Evergreen Road • Travelers Towers • Suite 1116
Southfield, Michigan 48076 • (313) 355-1050

January 13, 1984

MEDIA ADVISORY

YOU ARE INVITED TO ATTEND AND/OR COVER THE FOLLOWING:

DATE: Saturday, Feb. 4, 1984

PLACE: Georgetown Room, Washington Hilton Hotel

TIME: 7:00 p.m.

EVENT: Champagne reception to introduce the Great Eagle Medallion Sculpture (GEMS), a tribute to America's great eagles in precious metals and wood.

SCULPTOR: Western artist, Edward Fraughton who created the 1980 inaugural medals, commissioned by the Conservative Commemorative Society.

SPONSOR: "Great Through '88," a political action group committed to patriotism and conservative leadership.

PREVIEW: "Along Wit's Trail," a collection of the words of humor and wisdom of Ronald Reagan, edited by L. William Troxler.

The reception and unveiling of the commemorative art will precede the ball at the Washington Hilton in Celebration of the third anniversary of President Reagan's inauguration.

CONTACT: Lee Troxler
(202) 338-6962
Washington

Attachment I (p. 9)

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

26555 Evergreen Road • Travelers Towers • Suite 1116
Southfield, Michigan 48076 • (313) 355-1050

NEWS RELEASE

FOR IMMEDIATE RELEASE
January 12, 1983

CONTACT: Lee Troxler
(202) 338-6962

NEW PAC UNVEILS EXCEPTIONAL PRECEDENTS IN POLITICAL ART

WASHINGTON -- The newly formed political action group, "Great Through '88," will unveil the Great Eagle Medallion Sculpture (GEMS) collection at a third anniversary celebration of President Reagan's Inauguration. All proceeds above the established market value of the collection will go toward reelecting Ronald Reagan and conservative candidates who support the themes of the Reagan presidency.

The unveiling will be held on February 4, 1984, at the Washington Hilton Hotel, Georgetown Room at seven o'clock. The champagne reception will usher in the Third Anniversary Inaugural Ball in the Hilton's International Ballroom.

"Great Through '88" is a political organization deeply committed to American patriotism and on-going conservative leadership. Small in size, the PAC seeks to elevate the ideals of family, liberty and prosperity.

The Conservative Commemorative Society, Inc., a Michigan based political marketer, has been retained by Great Through '88 to coordinate the financing and marketing of the project.

As the November elections approach, and the GOP slogan "Lets Make America Great Again" becomes "Making America Great" or "Great Through '88," a concerted attempt is being made to offer conservatives an enduring investment opportunity in return for their political contributions.

The GEMS are available through a direct mail campaign, complemented by a toll-free order and telemarketing capability, and advertising in "National Review" magazine.

Being offered are high-relief art medallions -- in a choice of bronze, fine silver or 14-karat gold, presented on finely crafted mahogany sculptures -- in a choice of the Great Eagle or Republican Elephant. They are unique, beautiful, artpieces of heirloom quality; hand-carved in America, they symbolize the happiness and prosperity that Ronald and Nancy Reagan radiate from

Attachment I (p. 16)

Page Two

The medallions are minted by the Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and the Ronald Reagan Inaugural Medallion.

The sculptures and the medallions are created by Edward Fraughton of Utah, the western sculptor renowned for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to the leading, involved and caring Americans who make America the greatest country in the history of the world, since Mr. Fraughton was asked by Ronald Reagan to create his Inaugural medallions.

The medallion obverse features a portrait of the President and his First Lady, in formal attire. This is believed to be a first, a collectors' item of extraordinary numismatic importance, especially in light of current favorable market conditions for precious metals.

The GEMS to be unveiled are number one in the limited series of 500. Number One and Number Two will be presented to Ronald Reagan and George Bush respectively at a later date. Limited numbers of the political art will be offered to conservatives in attendance at the unveiling, compliments of the Conservative Commemorative Society, Inc.

Also on display at the unveiling ceremony will be an advance of publication printing of the book, "Along Wit's Trail," edited by L. William Troxler. Filled with President Reagan's favorite jokes, old yarns and quips, the book illustrates how he uses his gift of humor to out-wit political adversaries and endear friends. The book will be published by Holt Rinehart & Winston in the Spring.

Enclosed is a brochure describing the Great Eagle Medallion Sculpture collection.

Attachment I (p. 11)

CCC #954

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L. William Troxler

October 6, 1983

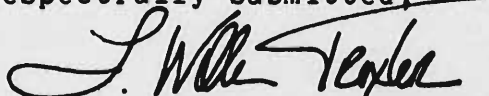
Re: Advisory Opinion on Separate Segregated Fund Activity

On October 1, 1983, a separate segregated fund was established and application for registration was made to the Federal Elections Commission on FEC Form 1. The SSF, named "Great Through '88," is not affiliated with any organization and intends to raise money to contribute to and make independent expenditures on behalf of candidates for political office.

To raise money, the SSF will contract with the Conservative Commemorative Society, Inc. (CCS), for the purposes of producing and marketing handsome commemorative displays. Proceeds from the sales will be deposited by CCS into the treasury of the SSF.

Please advise on the correct methods and procedures for interfacing the two organizations. Any related information that might concern the SSF or CCS would also be appreciated. Thank you for your assistance.

Respectfully submitted,



L. William Troxler
Director, Great Through '88

Attachment II

1549 35th Street, N.W., Suite One
Washington, D.C. 20007

Ccc#958

REC

OCT 14 1983 11

L. William Troxler

October 8, 1983

Re: Request for Withdrawal of Advisory Opinion

This letter is to request that the Commission withdraw my original submission for an advisory opinion of October 6, 1983, on behalf of Great Through '88, a separate segregated fund established and registered with the Commission on October 1, 1983.

This request is made following a review of several advisory opinions in the Federal Election Campaign Financing Guide, (CCH), which make it clear that more complete detail is needed.

I will promptly forward another request for an advisory opinion.

Sincerely,



L. William Troxler

14/17
Draft letter to
Read (A)

Attachment III

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October 11, 1983

On October 1, 1983, the separate segregated fund, Great Through '88, was established and registered with the Commission. Great Through '88, is not affiliated, under the Act, with any other organization. Great Through '88 proposes to raise money to make contributions to and independent expenditures on behalf of candidates for Federal office in the 1984 elections.

51 50 49 48 47 46 45 44 43 42

The commemorative offerings are coffee table displays, featuring a gold, silver or bronze medallion on a hand-carved walnut eagle or elephant, together symbolizing the owner's commitment to his country and conservative ideals.

Respectfully submitted,

L. William Troxler

1549 35th Street, N.W., Suite One
Washington, D.C. 20007



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1983

L. William Troxler, Treasurer
Great Through '88
1549 35th Street, N.W., Suite One
Washington, D.C. 20007

Dear Mr. Troxler:

This refers to your letter dated October 11, 1983, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended, to a proposed fundraising activity of the political committee called Great Through '88.

Your letter summarizes a plan to produce and market commemoratives, including a book called Americans for the Reagan Agenda, the proceeds of which the committee will report as contributions in disclosure reports filed under the Act and Commission regulations. You state that Great Through '88 will conduct this activity as a "separate segregated fund." Records on file with the Commission indicate that Great Through '88 has registered as a separate segregated fund. However, the Statement of Organization on file for the committee discloses no "connected organization". Your letter indicates further that the committee is not affiliated with any corporation or any other organization.

Under the Act and regulations a separate segregated fund is a political committee established and maintained by a corporation or labor organization for political purposes. 2 U.S.C. 441b(b)(2)(C) and 11 CFR 100.5(b). A "connected organization" is any organization which is not a political committee but which directly or indirectly establishes, administers or financially supports a political committee, including a corporation. 11 CFR 100.6(a). At the time of registration, political committees must disclose any connected organization. 11 CFR 102.2(b).

For your reference, I have enclosed copies of two Commission publications. The Campaign Guide for Corporations and Labor Organizations is directed toward assisting separate segregated funds in complying with the Act's requirements. The Campaign Guide for Non-Connected Committees is designed to aid committees not sponsored by any corporation or labor organization.

Attachment V

As you may know, the Commission's advisory opinion procedure is available only to address a specific transaction or activity presented by the requesting person. 11 CFR 112.1(b). Such a request must also be complete with reference to all relevant facts. 11 CFR 112.1(c).

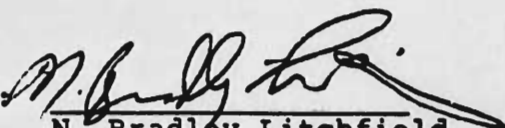
To proceed with consideration of your letter as an advisory opinion request, additional facts concerning several points addressed by your letter are necessary. Please provide written responses to the following questions:

- (1) Is Great Through '88 directly or indirectly established or maintained by a corporate entity? If so, identify that corporation.
- (2) What is the nature of the stated agency relationship between Great Through '88 and the Conservative Commemorative Society, Inc.?
- (3) Please provide copies of any contracts, agreements, or other documents that explain the relationship referred to in question (2).
- (4) What is the source of the funds that will be used to purchase commemorative items?

Upon receiving the clarifying information referred to above, this office will give further consideration to your inquiry as an advisory opinion request. If you have any questions about this matter please contact the undersigned. If you wish to telephone, Mr. Litchfield's number is 202-523-4039.

Very truly yours,

Charles N. Steele
General Counsel

by 
N. Bradley Litchfield
Assistant General Counsel

Enclosures

Attachment V (p.2)

860405547



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

L. William Troxler, Treasurer
Great Through '88
1549 - 35th Street, N.W.
Suite One
Washington, D.C. 20007

RE: MUR

Dear Mr. Troxler:

On , 1984, the Federal Election Commission determined that there is reason to believe that Great Through '88 and you, as treasurer, violated 2 U.S.C. § 441d(a)(3), 2 U.S.C. § 434(a)(4), 2 U.S.C. § 441b, and 2 U.S.C. § 438(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

L. William Troxler, Treasurer
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Questions
Procedures
Designation of Counsel Statement

86040555549

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT Great Through '88
L. William Troxler, Treasurer

SUMMARY OF ALLEGATIONS

Great Through '88 and L. William Troxler, as treasurer, together with the Conservative Commemorative Society, Inc. (hereinafter "the Society") violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission; Great Through '88 and L. William Troxler, as treasurer of Great Through '88, with the Society, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, Great Through '88 and L. William, as treasurer of Great Through '88, together with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for a commercial purpose.

FACTUAL BASIS AND LEGAL ANALYSIS

On October 14, 1983, this Office received an advisory opinion request from L. William Troxler. However, Mr. Troxler also withdrew his request for an advisory opinion on the same

day, stating that a new and more detailed request would be submitted at a later date.

On October 20, 1983, this Office received the promised revised advisory opinion request. The request outlined a plan to raise funds for Great Through '88, an independent political committee by producing and marketing commemoratives through the Society, a corporate entity.

On November 1, 1983, this Office responded to Mr. Troxler's advisory opinion request by requesting additional information concerning his plans to produce and market commemoratives, including a book Americans for the Reagan Agenda. To date, Mr. Troxler has failed to respond to this Office's request for additional information for the sole purpose of drafting an advisory opinion pursuant to his request.

Although Mr. Troxler has failed to respond to a request for additional information, he has not failed to implement his plans to produce and market merchandise through the Society in order to finance Great Through '88's political agenda.

According to Justice and the information provided, the Society mailed solicitations on behalf of Great Through '88. The mailing is soliciting contributions for Great Through '88 and is advocating support for and the reelection of Ronald Reagan and other federal candidates. However, the Society has failed to place the required § 441d disclaimer notice on the solicitations. Additionally, Great Through '88 registered with the Commission on October 13, 1983, but to date has failed to file the required report(s) of receipts and disbursements.

Furthermore, the plan designed by Mr. Troxler to fund a political committee through a corporate entity guarantees an infusion of corporate funds that will ultimately be used in connection with a federal election campaign. Finally, it appears that Mr. Troxler may have compiled a list of potential contributors and future commercial contacts from certain reports filed with the Commission. This has been determined by the language: "We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign" used in the solicitation letter (Attachment I, p. 5) mailed by the Society on behalf of Great Through '88. The aforestated language seems to indicate that the addressee's name was pulled from certain reports filed with the Commission during and for the 1980 presidential election.

2 U.S.C. § 441d(a) (3) states that any person who makes

an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate's committee.

Additionally, 2 U.S.C. § 434(a) (4) requires all political committees other than authorized committees to file certain reports during the calendar year; 2 U.S.C. § 441b expressly

prohibits the use of corporate funds in connection with any federal election campaign; and 2 U.S.C. § 438(a)(4) expressly prohibits the use of the statements and reports on file with the Commission for the purpose of soliciting or for commercial purposes.

Based on the above, it appears that the Society, together with Great Through '88 and L. William Troxler as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to state the name of the person(s) and/or political entity that paid for the mailing of the political solicitations and that the solicitation is not authorized by any candidate or candidate's committee. Additionally, Great Through '88 and L. William Troxler*/ as treasurer of Great Through '88, violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission. Finally, Great Through '88 and L. William Troxler, as treasurer of Great Through '88, with the Society, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, it appears that Great Through '88 and L. William Troxler as treasurer of Great Through '88 with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports

*/ 2 U.S.C. § 434(a)(1) states:

each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of this subsection. The treasurer shall sign each such report.

on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes.

Questions have been prepared to ascertain the relationship of the entities because of Mr. Troxler's prominence in both. According to the Statement of Organization, Mr. Troxler is both Treasurer and Director of Great Through '88, in addition to being the Director of the Society. Therefore, the Office of General Counsel recommends that reason to believe be found against Great Through '88 and L. William Troxler as treasurer of Great Through '88.

860405554

QUESTIONS FOR L. WILLIAM TROXLER, TREASURER
GREAT THROUGH '88

1. What positions do you hold in the two (2) following entities:
 - a. Great Through '88
 - b. The Conservative Commemorative Society, Inc.
2. Are any of the above paid positions?
3. Is the Society a registered corporation? If so,
 - a. what state;
 - b. date of incorporation.
4. What is the stated legal purpose of the Society?
 - a. Please provide the Articles of Incorporation.
5. Please name and identify all officers of the Society.
6. Please name and identify all officers of Great Through '88.
7. What is the nature of the stated agency relationship between Great Through '88 and the Society?
8. Please provide copies of any contracts, agreements or other documents that explain the relationship referred to above.
9. Is Great Through '88 directly or indirectly established or maintained by a corporate entity? If so, identify the corporation.
10. What is the source of the funds that will be used to purchase the commemorative items?

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

RE: MUR

Dear Mr. Troxler:

On , 1984, the Federal Election Commission determined that there is reason to believe that the Conservative Commemorative Society, Inc. violated 2 U.S.C. § 441d(a)(3), 2 U.S.C. § 441b, and 2 U.S.C. § 438(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Mr. L. William Troxler
Page 2

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Conley Edwards, Jr. at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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RESPONDENT The Conservative Commemorative
Society, Inc.
L. William Troxler, Director

The Conservative Commemorative Society, Inc. (hereinafter "the Society") together with Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 441d(a)(3) by failing to attach the required disclaimer notice to the solicitations that were mailed on behalf of Great Through '88, a registered political entity. Additionally, Great Through '88 and L. William Troxler as treasurer violated 2 U.S.C. § 434(a)(4) by failing to file the required reports subsequent to its October 13, 1983, registration with the Commission; the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for a commercial purpose.

On October 14, 1983, this Office received an advisory opinion request from L. William Troxler. However, Mr. Troxler also withdrew his request for an advisory opinion on the same

day, stating that a new and more detailed request would be submitted at a later date. On October 20, 1983, this Office received the promised revised advisory opinion request. The request outlined a plan to raise funds for Great Through '88, an independent political committee by producing and marketing commemoratives through the Society, a corporate entity.

On November 1, 1983, this Office responded to Mr. Troxler's advisory opinion request by requesting additional information concerning his plans to produce and market commemoratives, including a book Americans for the Reagan Agenda. To date, Mr. Troxler has failed to respond to this Office's request for additional information for the sole purpose of drafting an advisory opinion pursuant to his request.

Although Mr. Troxler has failed to respond to a request for additional information, he has not failed to implement his plans to produce and market merchandise through the Society in order to finance Great Through '88's political agenda.

According to Justice and the information provided, the Society mailed solicitations on behalf of Great Through '88. The mailing is soliciting contributions for Great Through '88 and is advocating support for and the reelection of Ronald Reagan and other federal candidates. However, the Society has failed to place the required § 441d disclaimer notice on the solicitations. Furthermore, the plan designed by Mr. Troxler to fund a political committee through a corporate entity guarantees an infusion of corporate funds that will ultimately be used in connection with a

2 U.S.C. § 441d(a)(3) states that any person who makes

Additionally, 2 U.S.C. § 434(a)(4) requires all political committees other than authorized committees to file certain reports during the calendar year; 2 U.S.C. § 441b expressly prohibits the use of corporate funds in connection with any federal election campaign; and 2 U.S.C. § 438(a)(4) expressly prohibits the use of the statements and reports on file with the

Commission for the purpose of soliciting or for commercial purposes.

Based on the above, it appears that the Society, together with Great Through '88 and L. William Troxler as treasurer of Great Through '88, violated 2 U.S.C. § 441d(a)(3) by failing to state the name of the person(s) and/or political entity that paid for the mailing of the political solicitations and that the solicitation is not authorized by any candidate or candidate's committee. Additionally, the Society with Great Through '88 and L. William Troxler, as treasurer of Great Through '88, violated 2 U.S.C. § 441b by raising corporate funds to be used in connection with a federal election campaign. Finally, it appears that Great Through '88 and L. William Troxler as treasurer of Great Through '88 with the Society, violated 2 U.S.C. § 438(a)(4) by using certain reports on file with the Commission to compile a list of individuals to solicit political contributions and to contact for future commercial purposes. Therefore, the Office of General Counsel recommends that reason to believe be found against the Conservative Commemorative Society, Inc.



U.S. Department of Justice

GEMCD:NSS:pk
186-017-16

RECEIVED AT THE FEC

GEC # 2142
84 APR 16 AIO: 04

Washington, D.C. 20530

PM 120

APRIL 12, 1984

APR 16 2:13 PM '84

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. ~~Steele~~ *Charlie* -

Enclosed please find a photocopy of a solicitation recently referred to our office by Fred F. Fielding, Counsel to President Ronald Reagan. A copy of Mr. Fielding's forwarding memorandum is also enclosed for your information.

The solicitation was sent over the signature of one L. William Troxler on behalf of a political committee called "Great Through '88." The mailing solicits contributions to "Great Through '88" and advocates support for the reelection of President Reagan and other federal candidates.

In light of the possible application of the notice requirement of 2 U.S.C. §44ld to this communication, we are forwarding this matter to the Federal Election Commission for whatever action the Commission considers appropriate. A copy of our letter to Mr. Troxler advising him of our referral of this matter to you is also enclosed herein.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By:

Nancy S. Stewart

NANCY S. STEWART, Attorney
Public Integrity Section

Enclosures



GEMCD:NSS:pk
186-017-16

Washington, D.C. 20530

Mr. L. William Troxler
The Conservative Commemorative
Society, Inc.
26555 Evergreen Road
Travelers Towers, Suite 1116
Southfield, Michigan 48076

Dear Mr. Troxler:

This is to advise that we have recently received a complaint regarding a political solicitation sent over your signature on behalf of an organization called "Great Through '88." A copy of this solicitation is enclosed herein.

The solicitation requests contributions to "Great Through '88," through the purchase of "Great Eagle Medallion Sculptures." Solicitees are advised that all proceeds above the market value of the medallions will be used by "Great Through '88" to support the reelection effort of President Ronald Reagan and the election of conservative Congressmen who support the President. The solicitation was addressed to Fred Fielding, "W H O 2nd Floor, Executive Ofc of Pres, Washington, DC," and was received by Mr. Fielding at his place of federal employment at this address.

This is to advise that Section 607 of Title 18 of the United States Code prohibits the transmission of political solicitations such as the enclosed to addresses where federal officers and employees are performing official duties. Violations of Section 607 are federal felonies, punishable by imprisonment for up to three years and a fine of up to \$5,000.

You will note that the federal character of the address to which the instant solicitation was sent is evident on the face of the solicitation.

We trust that you will take immediate and personal measures to delete this address, and all other addresses bearing indicia of a federal nature, from your solicitation lists.

360405564

In addition, the Federal Election Campaign Act, 2 U.S.C. §431 et seq., requires that any communication by way of general public political mailings or advertisements which solicits contributions for a federal election, or which advocates the election of a clearly identified federal candidate, state on the face of the communication the entity who paid for or authorized the communication. 2 U.S.C. §441d. The enclosed solicitation advocates the election of President Reagan and other federal candidates, and solicits contributions toward that end, but does not appear to reflect such a notice. We have referred this aspect of the matter to the Federal Election Commission, which has civil and administrative jurisdiction over such matters. See 2 U.S.C. §437g(a) and (d).

We trust that this information will prove useful to you in any future solicitations.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

Enclosure

360405353

Feb 17 5 14 1984

THE WHITE HOUSE
WASHINGTON

February 15, 1984

RECEIVED
DEPT. OF JUSTICE

FEB 17 1984

DEPT. OF JUSTICE
ATTORNEY GENERAL

MEMORANDUM FOR D. LOWELL JENSEN
ACTING DEPUTY ATTORNEY GENERAL
U. S. DEPARTMENT OF JUSTICE

FROM: FRED F. FIELDING
COUNSEL TO THE PRESIDENT

SUBJECT: Solicitation From L. William Troxler

I recently received the attached letter from L. William Troxler soliciting contributions to his organization "Great Through '88." As this organization appears to be a political committee, Troxler may have violated 18 U.S.C. § 607 by sending a solicitation to my Federal office. Accordingly, I am referring this information to you for whatever action, if any, you deem appropriate.

RECEIVED

MAR 26 1984

Public Integrity Section

8604055566



*In Honor of
the Great Eagles
of American Society*

Fred Fielding
W H O 2nd Floor
Executive Ofc Of Pres
Washington, DC 20500

SMK-
Pls review
? see me
→ 1/17

199438u

Dear American,

=

The greatest country in the history of the world is the United States today. Family. Liberty. Prosperity.

Our America is the glory of human society. And you, the involved, caring, leading American, are the Great Eagle who will keep America great.

In Your honor, Great Through '88 has now authorized the historic Great Eagle Medallion Sculpture collection -- as a tribute to you.

Let me explain.

We recognize your deep commitment to America and President Reagan. You demonstrated it by contributing to Ronald Reagan's first campaign. And we wish to celebrate your role as a guiding force in the American society of tomorrow.

Our on-going conservative presidential leadership offers the greatest promise for our future. President Reagan, speaking to his executive staff on January 20, 1983, said it best:

"We were sent here to move America forward again by putting people back in charge of their own country...to give individuals the opportunities to reach for their dreams."

Those of us listening to the President at that meeting were inspired to form Great Through '88, so that we all could contribute our most, and best, again. Along with the Conservative Commemorative Society, we've launched an ambitious and long-overdue undertaking.

We have authorized a unique collection of high-relief art medallions presented on hand carved mahogany sculptures -- as a tribute to you and to President Reagan.

Congratulations Great Eagle!

You should know that all proceeds from this limited issue go to support Ronald Reagan's reelection drive, and to help elect conservative Congressmen who support the President. Therefore, contributions may qualify for a tax credit.

The enclosed brochure illustrates the collection in detail.

In case you're curious, the idea for the collection was born from Ronald Reagan's love of the outdoors as a woodsman.

The centerpiece of it all is the Great Eagle Medallion Sculpture. The acronym, GEMS, is really quite fitting -- for they are superb gems.

Your official Medal of Honor is offered in 14-karat gold, fine silver, or bronze -- your choice. It is minted by Medallie Art Company of Connecticut, America's oldest and foremost medalist.

The beautifully detailed, hardwood sculptures for medallion display are modern masterpieces of timeless beauty. The sculptures and the Medal of Honor are brought to life by Edward Fraughton of Utah, the renowned western sculptor and creator of Ronald Reagan's Inaugural Medals.

The American Eagle sculpture, or the Republican Elephant sculpture, if you prefer, will accent your home or office with grace and warmth, delighting all who view it.

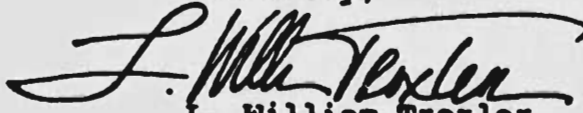
To order your Great Eagle Commemoratives, just complete and mail the enclosed order form. Or save time: Call toll free, 800 435-4444 during regular business hours. Our customer service representative will be happy to answer your questions and take your suggestions.

Call us or write by January 20th and Mr. Fraughton will etch your name along with an inspirational message on conservatism into the foot of the sculpture. Plus, we'll send you complimentary copies of two new books on Ronald Reagan. Look in the brochure for a description of them.

Great Through '88 can only make available a limited edition of the commemoratives, so please, take advantage of this offer this afternoon.

Your Great Eagle Medallion Sculpture will be a treasured source of pride and inspiration for you and your loved ones, for now and through the years.

Sincerely,


L. William Troxler
Director

11 01 NY 21 NY 481

P.S. Remember, proceeds go toward making Ronald Reagan the first successful two-term President since Dwight D. Eisenhower. Remember too, order by January 20th for a personalized edition and complimentary books.

The Great Eagle Medallion Sculpture

The American Eagle Sculpture, and the Republican Elephant Sculpture will certainly become coveted legacies, accenting your home with grace and warmth, delighting all who view them.

The sculptures, and the Medal of Honor, are created by Edward Fraughton of Utah, the western sculptor known for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to Ronald and Nancy Reagan and the Great Eagles. Mr. Fraughton was asked by the President to create his first Inaugural Medal. Also, his works are displayed in the White House.

The medallions are minted by the historic Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and of course, the Official Ronald Reagan Inaugural Medallion.

Six Ways The Great Eagle Medallion Sculpture Will Delight the Connoisseur

An Investment of Value
World Famous Craftsmanship
Unique, Exclusive Significance
Unconditional Guarantee
Strictly Limited Editions

REQUEST DETAILS

PHONE ORDERS: It's the easiest way to order. Just pick up the phone and call toll free during business hours — 800 435-4484. In Illinois, call 800 892-6990 Ext 264. Thank you for only making credit card orders over the phone. Our customer service representative will be happy to answer your questions and take your suggestions.

	Each
* Great Eagle Sculpture	\$1050
* GOP Elephant Sculpture	650
* Gold medallion	950
* Silver medallion	95
* Bronze medallion	35

Request your sculpture, then choose your medallion for display on it. If you like, also request any of the commemoratives alone. Please call our toll free number for quantity discounts.



An Exceptional Precedent in Commemorative Art



The exquisitely detailed medallion. The superbly crafted sculptures. Combined they are gracious and enchanting works of timeless beauty.



OFFICIAL SPECIFICATIONS: By arrangement with the Conservative Commemorative Society, gold and silver medallions are strictly limited, serially numbered, and authenticated. These high-relief medallions include a protective display case. The 14KT gold art medal is 1 1/2" in diameter and contains approximately 1 1/2 troy ounces of gold. Gold edition limit: 500. The silver art medal is .999 fine, also 1 1/2", and contains approximately 1 1/4 troy ounces of silver. Silver edition limit: 1500. The bronze is 2 3/4", hand rubbed to a rich antique patina. The sculptures are hand-carved in America from solid mahogany. The Great Eagle is 18" tall, with a 24" wingspan. The GOP Elephant is 9" high and 11" long. Sculpture edition limit: 1,000 of each.

NR**NATIONAL REVIEW**

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LETTERS**A Bad Business**

I hope some businessmen out there are listening to Arch Puddington ["Business, Labor, and the Anti-Communist Struggle," Jan. 27]. It certainly is ironic that the very bourgeoisie to which Communism is implacably hostile is so friendly to the Communists. Unfortunately, it lends credence to the charge that businessmen are basically unprincipled profit-makers. Will they be too offended by the suggestion that they follow the example of the labor unions?

Howard E. Frazer
 Philadelphia, Pa.

Yellow Rags

In his article "The Media at Bay" (Dec. 23), William F. Rickenbacker cites Irving Kristol's reference to the decline in standards of the highbrow press after World War II as formal education shifted in a more job-oriented direction. Toyabec saw a cause-and-effect relation between the introduction of universal primary education in England in the mid-nineteenth century and the emergence of the yellow press in the next generation.

If the yellow press has folded and the highbrow press has taken a middle position to fill the gap, isn't it just possible, in a country in which a significant percentage of high-school students today couldn't locate Paris or Moscow on a world map, that in another twenty years we will have come full circle, with a press on average like the worst rags of the 1890s?

Daniel F. Keay Jr.
 Goodwater, Ala.

Back Order

"It Says Here . . ." [Dec. 23] is priceless—and so are all the other Christmas pieces by Aloise Buckley Heath. As soon as the book containing them is back in print, I should like to order a copy.

Irma M. Zagel
 Fort Wayne, Ind.

Industrial Sunrise

One omission in almost every discussion of industrial policy (cf. "Sunset for Industrial Policy?" by Tom Bethell, Dec. 9) is the realization that President Reagan has already put in place a comprehensive strategy to strengthen U.S. competitiveness in world markets. This

competitive strategy is based on America's strengths—of our people, our heritage, and our system.

This strategy has several parts: creating an environment for long-term, non-inflationary economic growth; freeing business from excessive government regulation, which has diverted capital into nonproductive areas; encouraging steady monetary growth; equalizing the terms of trade through bilateral and multilateral agreements; strengthening our industrial base through tax policies that encourage more research, development, and innovation; revising our antitrust laws to permit mature industries to consolidate and to allow companies to conduct joint R&D; reviewing federal R&D policies to see how they can better contribute to commercial opportunities; and, finally, upgrading the curricula for primary and secondary education to produce technologically literate citizens who can sustain a "knowledge economy."

Clarence J. Brown
 Deputy Secretary of Commerce
 Washington, D.C.

Tom Bethell's article does a good job of describing the futility of any industrial policy based on massive bureaucratic intervention and centralized priming.

This kind of industrial policy is based on the arrogant fallacy that bureaucrats isolated from the realities of the marketplace can pick the next generation of corporate winners and losers. This kind of policy tends to discount and distrust the innovation and entrepreneurial skill that usually characterized successful new firms and so-called sunrise industries.

Further, it tends to put a premium on grantsmanship—the manipulation of the political and bureaucratic systems to maximize subsidies and protective regulations.

As a result, taxpayers are short-changed, politicians become the victims of their own unrealistic expectations, and would-be entrepreneurs face the unwelcomed prospect of subsidized competition. All of which goes to illustrate that one of the three greatest lies in the English language is: "I'm from the government and I'm here to help you."

Geoffrey E. Hale
 Canadian Organization of Small Business
 Toronto, Ont.

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

26555 Evergreen Road • Travelers Towers • Suite 1116
Southfield, Michigan 48076 • (313) 355-1050

January 13, 1984

MEDIA ADVISORY

YOU ARE INVITED TO ATTEND AND/OR COVER THE FOLLOWING:

DATE: Saturday, Feb. 4, 1984

PLACE: Georgetown Room, Washington Hilton Hotel

TIME: 7:00 p.m.

EVENT: Champagne reception to introduce the Great Eagle Medallion Sculpture (GEMS), a tribute to America's great eagles in precious metals and wood.

SCULPTOR: Western artist, Edward Fraughton who created the 1980 inaugural medals, commissioned by the Conservative Commemorative Society.

SPONSOR: "Great Through '88," a political action group committed to patriotism and conservative leadership.

PREVIEW: "Along Wit's Trail," a collection of the words of humor and wisdom of Ronald Reagan, edited by L. William Troxler.

The reception and unveiling of the commemorative art will precede the ball at the Washington Hilton in Celebration of the third anniversary of President Reagan's inauguration.

CONTACT: Lee Troxler
(202) 338-6962
Washington

360405571

THE CONSERVATIVE COMMEMORATIVE SOCIETY, INC.

26555 Evergreen Road • Travelers Towers • Suite 1116
Southfield, Michigan 48076 • (313) 355-1050

NEWS RELEASE

FOR IMMEDIATE RELEASE
January 12, 1983

CONTACT: Lee Troxler
(202) 338-6962

NEW PAC UNVEILS EXCEPTIONAL PRECEDENTS IN POLITICAL ART

WASHINGTON -- The newly formed political action group, "Great Through '88," will unveil the Great Eagle Medallion Sculpture (GEMS) collection at a third anniversary celebration of President Reagan's Inauguration. All proceeds above the established market value of the collection will go toward reelecting Ronald Reagan and conservative candidates who support the themes of the Reagan presidency.

The unveiling will be held on February 4, 1984, at the Washington Hilton Hotel, Georgetown Room at seven o'clock. The champagne reception will usher in the Third Anniversary Inaugural Ball in the Hilton's International Ballroom.

"Great Through '88" is a political organization deeply committed to American patriotism and on-going conservative leadership. Small in size, the PAC seeks to elevate the ideals of family, liberty and prosperity.

The Conservative Commemorative Society, Inc., a Michigan based political marketer, has been retained by Great Through '88 to coordinate the financing and marketing of the project.

As the November elections approach, and the GOP slogan "Lets Make America Great Again" becomes "Making America Great" or "Great Through '88," a concerted attempt is being made to offer conservatives an enduring investment opportunity in return for their political contributions.

The GEMS are available through a direct mail campaign, complemented by a toll-free order and telemarketing capability, and advertising in "National Review" magazine.

Being offered are high-relief art medallions -- in a choice of bronze, fine silver or 14-karat gold, presented on finely crafted mahogany sculptures -- in a choice of the Great Eagle or Republican Elephant. They are unique, beautiful, artpieces of heirloom quality; hand-carved in America, they symbolize the happiness and prosperity that Ronald and Nancy Reagan radiate from the Executive mansion.

Page Two

The medallions are minted by the Medallion Art Company of Connecticut, maker of the Congressional Medal of Honor, the Pulitzer Prize Medal, and the Ronald Reagan Inaugural Medallion.

The sculptures and the medallions are created by Edward Fraughton of Utah, the western sculptor renowned for the power and force he brings to his art. It is fitting that Mr. Fraughton accept this challenge to create a lasting tribute to the leading, involved and caring Americans who make America the greatest country in the history of the world, since Mr. Fraughton was asked by Ronald Reagan to create his Inaugural medallions.

The medallion obverse features a portrait of the President and his First Lady, in formal attire. This is believed to be a first, a collectors' item of extraordinary numismatic importance, especially in light of current favorable market conditions for precious metals.

The GEMS to be unveiled are number one in the limited series of 500. Number One and Number Two will be presented to Ronald Reagan and George Bush respectively at a later date. Limited numbers of the political art will be offered to conservatives in attendance at the unveiling, compliments of the Conservative Commemorative Society, Inc.

Also on display at the unveiling ceremony will be an advance of publication printing of the book, "Along Wit's Trail," edited by L. William Troxler. Filled with President Reagan's favorite jokes, old yarns and quips, the book illustrates how he uses his gift of humor to out-wit political adversaries and endear friends. The book will be published by Holt Rinehart & Winston in the Spring.

Enclosed is a brochure describing the Great Eagle Medallion Sculpture collection.

Department of Justice

on, D.C. 20530

Private Use \$300

PIS

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Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



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JUS-431





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