



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2108

Date Filmed 8/1/86 Camera No. ---3

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FEDERAL ELECTION COMMISSION

12 routing cards (5); 5 Comment Sheet/Per Buy Report (15);
5 Proposed RFA's (2.5) Index to Permanent File (15);
5, 2 Day Report/Comment Sheet (15); 2 Objection Sheet (5)

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 Patty Kelly

date 7/11/86

REC 9-21-77

36030604728



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2 July, 1986

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street
Anchorage, Alaska 99501

RE: MUR 2108
Eklunta Corporation, and
Daniel Alex, as president
in 1984

Dear Mr. Wolf:

This is to advise you that after an investigation was conducted, the Commission concluded on June 24, 1986, that there is no probable cause to believe that your clients violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

36030504729



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 2, 1986

**David Diepenbrock, Esquire
Republican Party of Alaska
750 E. Fireweed Lane, Suite 102
Anchorage, Alaska 99503**

**RE: MUR 2108
The Republican Party of
Alaska**

Dear Mr. Diepenbrock:

This is to advise you that after an investigation was conducted, the Commission concluded on June 24, 1986, that there is no probable cause to believe that the Republican Party of Alaska violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

85030604730



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Diepenbrock, Esquire
Republican Party of Alaska
750 E. Fireweed Lane, Suite 102
Anchorage, Alaska 99503

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

This is to advise you that after an investigation was conducted, the Commission concluded on , 1986, that there is no probable cause to believe that the Republican Party of Alaska violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

PC 6/26/86
HJ 6/26/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street
Anchorage, Alaska 99501

RE: MUR 2108
Eklunta Corporation, and
Daniel Alex, as president
in 1984

Dear Mr. Wolf:

This is to advise you that after an investigation was conducted, the Commission concluded on June 24, 1986, that there is no probable cause to believe that your clients violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

PH 6/26/86

Steele
6/26/86

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Eklutna, Inc.

The Republican Party of Alaska

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MUR 2108

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 24, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2108:

1. Find no probable cause to believe Eklutna Corporation and Daniel Alex, as its president in 1984, violated 2 U.S.C. § 441b(a).
2. Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b(a).
3. Close the file in this matter.
4. Approve the letters attached to the General Counsel's report dated June 12, 1986.

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

Attest:

6-24-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

85030604733

BEFORE THE FEDERAL ELECTION COMMISSION

ED
OF THE FEC
COMMISSION SECRETARY

In the Matter of)
Eklutna Inc.)
The Republican Party)
of Alaska)

MUR 2108

66 JUN 13 A10:42

SENSITIVE
EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

JUN 24 1986

I. BACKGROUND

This matter arose from a letter sent to the Office of the General Counsel on August 27, 1985, from Eklutna, Inc. ("the Corporation"). The letter raised the possibility that the Corporation may have made a prohibited corporate contribution to the Republican Party of Alaska, a political committee registered with the Commission. The Corporation also provided a \$5,000 cancelled check payable to "Election 84" and drawn on the Corporation's general treasury. The check had been endorsed by the Republican Party of Alaska, with the check stub noting the transaction as a "political contribution [to the] Reagan Bush" campaign.

On December 3, 1985 the Commission found reason to believe Eklutna Inc. and Daniel Alex, as its president in 1984, as well as the Republican Party of Alaska violated 2 U.S.C. § 441b(a), and approved questions for these respondents. The Commission also approved questions to the Reagan-Bush Committee as a witness.

II. LEGAL ANALYSIS

As detailed in the General Counsel's Brief of April 29, 1986, the Republican Party of Alaska maintained both state and federal accounts. The corporate contribution in question was

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deposited into the Party's state account and was not used in connection with a federal election. The State of Alaska does not prohibit such contributions for state election activities.

The Republican Party of Alaska apparently does not disagree with the analysis contained in the General Counsel's Briefs. See Response of the Republican Party at Attachment I. Eklutna Corporation also expressed agreement with this analysis in a telephone conversation with staff on May 22, 1986.

III. RECOMMENDATIONS

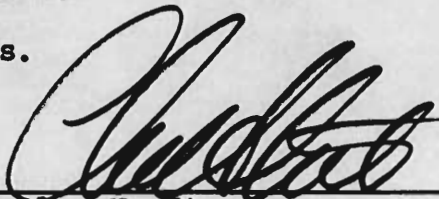
1. Find no probable cause to believe Eklutna Corporation and Daniel Alex, as its president in 1984, violated 2 U.S.C. § 441b(a).

2. Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b(a).

3. Close this file in this matter.

4. Approve the attached letters.

12 June 1986
Date



Charles N. Steele
General Counsel

Attachments

1. Response of Republican Party of Alaska
2. Proposed letters (2)

86030604735

The Republican Party of Alaska

P.O. Box 104863
Anchorage, AK 99510
(907) 276-4467



CC: #
MAY 15 AID

May 8, 1986

Federal Election Commission
Charles N. Steele
General Counsel
Washington, D.C. 20463

RE: MUR 2108
The Republican Party of
Alaska

16 MAY 15 P 2:47

Dear Mr. Steele,

I wish to acknowledge receipt of your letter in which you state that the Office of General Counsel is "prepared to recommend that the Commission find no probable cause to believe that a violation has occurred."

I am pleased with this recommendation and wish to thank you.

Yours,

A handwritten signature in dark ink, appearing to read "David Diepenbroek".
David Diepenbroek
Executive Director
Republican Party of AK

DD/MPM

P.S. I would appreciate it if you would note that we have a new address:

Republican Party of Alaska
750 E. Fireweed Lane, Suite 102
Anchorage, Alaska 99503

86030604730



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Diepenbrock, Esquire
Republican Party of Alaska
750 E. Fireweed Lane, Suite 102
Anchorage, Alaska 99503

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

This is to advise you that after an investigation was conducted, the Commission concluded on , 1986, that there is no probable cause to believe that the Republican Party of Alaska violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

ATTACHMENT # 242)

86030604737



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street
Anchorage, Alaska 99501

RE: MUR 2108
Eklunta Corporation

Dear Mr. Wolf:

This is to advise you that after an investigation was conducted, the Commission concluded on , 1986, that there is no probable cause to believe that your clients violated the Act. Accordingly the file in this matter, numbered MUR 2108, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Patty Reilly the attorney assigned to handle this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

86030604738

ATTACHMENT #2(2)

**The Republican Party
of Alaska**

P.O. Box 104963
Anchorage, AK 99510
(907) 276-4467



RECEIVED AT THE FEC
CCT#483
MAY 15 AID: 14

May 8, 1986

Federal Election Commission
Charles N. Steele
General Counsel
Washington, D.C. 20463

RE: MJR 2108
The Republican Party of
Alaska

36 MAY 15 P 2:47

Dear Mr. Steele,

I wish to acknowledge receipt of your letter in which you state that the Office of General Counsel is "prepared to recommend that the Commission find no probable cause to believe that a violation has occurred."

I am pleased with this recommendation and wish to thank you.

Yours,

David Diepenbrock
Executive Director
Republican Party of AK

DD/MRM

P.S. I would appreciate it if you would note that we have a new address:

Republican Party of Alaska
750 E. Fireweed Lane, Suite 102
Anchorage, Alaska 99503

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

the Republican Party of Alaska
Ekulutna, Inc.

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22 APR 15 P3:14

MUR 2108

GENERAL COUNSEL'S REPORT

Based on the information currently available, the Office of the General Counsel is prepared to close the investigation in this matter as to the Republican Party of Alaska and Ekulutna, Inc.

14 April 1988
Date


Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of
the Republican Party of Alaska
Ekulutna, Inc.

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APR 15 3:14

MUR 2108

GENERAL COUNSEL'S REPORT

Based on the information currently available, the Office of the General Counsel is prepared to close the investigation in this matter as to the Republican Party of Alaska and Ekulutna, Inc.

14 April 1986
Date


Charles N. Steele
General Counsel

86030604741



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 28, 1986

David Diepenbrock
The Republican Party of Alaska
P.O. Box 104963
Anchorage, Alaska 94150

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

Based on information supplied by Eklutna Inc. on August 27, 1985 the Commission determined on December, 3, 1985, that there was reason to believe that the Republican Party of Alaska had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

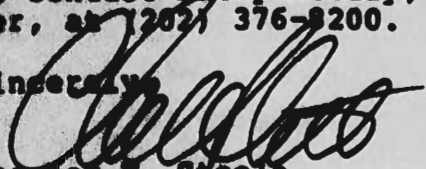
After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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Should you have any questions, please contact Patty Reilly,
the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles M. Steele
General Counsel

Enclosure
Brief

86030604743

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Republican Party of Alaska) MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna, Inc. ("the Corporation") indicating the Corporation may have made a prohibited corporate contribution to a federal political committee. The source of the Corporation's concern was a corporate check for \$5,000 payable to "Election 84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush Campaign.

On December 3, 1985 the Commission found reason to believe the Alaska Republican Party violated 2 U.S.C. § 441b. On this date the Commission also approved interrogatories for the Corporation and the Alaska Republican Party ("The Party").

Responses from the Party reveal it maintained six separate accounts; two for federal election activity and the remainder for state election activity. One federal account was called "Federal Fund '84". One state account was referred to as "Alaska Election '84." The Alaska Republican Party states that it was the similarity of these names which lead it to initially respond to the Corporation's inquiry by stating that the contribution in question was used for federal election activity.

The Party contends that the \$5,000 contribution from Eklutna was an unsolicited contribution deposited into the state account

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and used for state election activity. The Party offers the following evidence to support this contention.

First, the Party offers sworn statement of its current executive director that Alaska Election '84 was a state account used for state activity and that Federal Fund '84 consisted of only permissible funds. A review of Federal Funds reports on file with the Commission supports this statement. Second, the Party has provided a copy of the bank depository slip for Alaska Election '84 that lists this state account's deposit of the Eklutna contribution. Additionally, the monthly statement of Alaska Election '84 for the month of June 1984 has been provided which lists the total amount on this deposit slip as entering the Alaska Election '84 account. Fourth, respondents have provided a copy of its state accounts ledgers which also report the Eklutna contribution as entering the state account. Finally, the Party enclosed a portion of its Alaska state reports in which the Eklutna contribution is reported.

II. LEGAL ANALYSIS

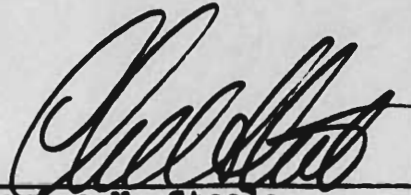
The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account. The funds were used in connection with state election activity. Thus, no corporate monies were used in connection with a federal election.

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III. RECOMMENDATIONS

Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b.

26 April 1986
Date



Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Republican Party of Alaska) MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna, Inc. ("the Corporation") indicating the Corporation may have made a prohibited corporate contribution to a federal political committee. The source of the Corporation's concern was a corporate check for \$5,000 payable to "Election 84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush Campaign.

On December 3, 1985 the Commission found reason to believe the Alaska Republican Party violated 2 U.S.C. § 441b. On this date the Commission also approved interrogatories for the Corporation and the Alaska Republican Party ("The Party").

Responses from the Party reveal it maintained six separate accounts; two for federal election activity and the remainder for state election activity. One federal account was called "Federal Fund '84". One state account was referred to as "Alaska Election '84." The Alaska Republican Party states that it was the similarity of these names which lead it to initially respond to the Corporation's inquiry by stating that the contribution in question was used for federal election activity.

The Party contends that the \$5,000 contribution from Eklutna was an unsolicited contribution deposited into the state account

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and used for state election activity. The Party offers the following evidence to support this contention.

First, the Party offers sworn statement of its current executive director that Alaska Election '84 was a state account used for state activity and that Federal Fund '84 consisted of only permissible funds. A review of Federal Funds reports on file with the Commission supports this statement. Second, the Party has provided a copy of the bank depository slip for Alaska Election '84 that lists this state account's deposit of the Eklutna contribution. Additionally, the monthly statement of Alaska Election '84 for the month of June 1984 has been provided which lists the total amount on this deposit slip as entering the Alaska Election '84 account. Fourth, respondents have provided a copy of its state accounts ledgers which also report the Eklutna contribution as entering the state account. Finally, the Party enclosed a portion of its Alaska state reports in which the Eklutna contribution is reported.

II. LEGAL ANALYSIS

The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account. The funds were used in connection with state election activity. Thus, no corporate monies were used in connection with a federal election.

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III. RECOMMENDATIONS

Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b.

Date _____

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Republican Party of Alaska) MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna, Inc. ("the Corporation") indicating the Corporation may have made a prohibited corporate contribution to a federal political committee. The source of the Corporation's concern was a corporate check for \$5,000 payable to "Election 84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush Campaign.

On December 3, 1985 the Commission found reason to believe the Alaska Republican Party violated 2 U.S.C. § 441b. On this date the Commission also approved interrogatories for the Corporation and the Alaska Republican Party ("The Party").

Responses from the Party reveal it maintained six separate accounts; two for federal election activity and the remainder for state election activity. One federal account was called "Federal Fund '84". One state account was referred to as "Alaska Election '84." The Alaska Republican Party states that it was the similarity of these names which lead it to initially respond to the Corporation's inquiry by stating that the contribution in question was used for federal election activity.

The Party contends that the \$5,000 contribution from Eklutna was an unsolicited contribution deposited into the state account

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and used for state election activity. The Party offers the following evidence to support this contention.

First, the Party offers sworn statement of its current executive director that Alaska Election '84 was a state account used for state activity and that Federal Fund '84 consisted of only permissible funds. A review of Federal Funds reports on file with the Commission supports this statement. Second, the Party has provided a copy of the bank depository slip for Alaska Election '84 that lists this state account's deposit of the Eklutna contribution. Additionally, the monthly statement of Alaska Election '84 for the month of June 1984 has been provided which lists the total amount on this deposit slip as entering the Alaska Election '84 account. Fourth, respondents have provided a copy of its state accounts ledgers which also report the Eklutna contribution as entering the state account. Finally, the Party enclosed a portion of its Alaska state reports in which the Eklutna contribution is reported.

II. LEGAL ANALYSIS

The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account. The funds were used in connection with state election activity. Thus, no corporate monies were used in connection with a federal election.

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III. RECOMMENDATIONS

Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b.

Date

Charles N. Steele
General Counsel

86030604752



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David Diepenbrock
The Republican Party of Alaska
P.O. Box 104963
Anchorage, Alaska 94150

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

Based on information supplied by Eklutna Inc. on August 27, 1985 the Commission determined on December, 3, 1985, that there was reason to believe that the Republican Party of Alaska had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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Should you have any questions, please contact Patty Reilly,
the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86030604754



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 28, 1986

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street, Suite 302
Anchorage, AK 99501

RE: MUR 2108
Eklutna Inc.

Dear Mr. Wolf:

Based on information supplied by your client on August 27, 1985, the Commission determined on December 3, 1985, that there was reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86030604755

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Eklutna, Inc.

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)
)

MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna Inc., ("the Corporation") indicating that past officers may have permitted the Corporation to make a prohibited corporate contribution in connection with a federal election. The source of the Corporation's concern was a corporate check for \$5,000, payable to "Election '84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush campaign.

On December 3, 1985 the Commission found reason to believe that Eklutna Inc. violated 2 U.S.C. § 441b and approved interrogatories.

Responding to these interrogatories, the Corporation provided a sworn statement from its bookkeeper, which states an initial check was made out to "Reagan-Bush Campaign." This check was subsequently voided on the instructions of the Corporation's then President, Daniel Alex. At his direction a new check was written with "Election '84" as the payee. Mr. Alex was given this check for delivery.

86030504756

Additional information provided by other respondents indicates "Election '84" was an Alaska State account of the Alaska Republican Party. Its full title was "Alaska Election '84." The Eklutna check was subsequently deposited into the Alaska Election '84 account and expended in connection with state election activity. The Alaska Republican Party states that it maintains another account entitled "Federal Fund '84". This account is used in connection with federal election activity. The Alaska Republican Party states that the similarity of the names of these two accounts lead it to erroneously inform Eklutna that the \$5,000 contribution was used in connection with a federal election. Additionally, the Party has provided a sworn statement from Mr. Alex that Eklutna's contribution was an unsolicited one.

II. LEGAL ANALYSIS

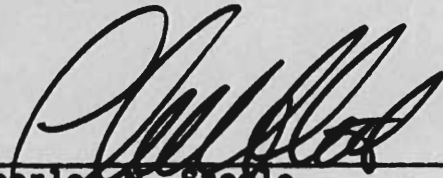
The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account of the Alaska Republican Party. The funds were used by a state account in connection with state activity. Thus, no corporate monies were contributed to or used in connection with a federal election.

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III. RECOMMENDATION

Find no probable cause to believe Eklutna Inc. violated
2 U.S.C. § 441b.

24 April 1986
Date



Charles N. Steele
General Counsel

86030604758

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Eklutna, Inc.

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)

MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna Inc., ("the Corporation") indicating that past officers may have permitted the Corporation to make a prohibited corporate contribution in connection with a federal election. The source of the Corporation's concern was a corporate check for \$5,000, payable to "Election '84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush campaign.

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Additional information provided by other respondents indicates "Election '84" was an Alaska State account of the Alaska Republican Party. Its full title was "Alaska Election '84." The Eklutna check was subsequently deposited into the Alaska Election '84 account and expended in connection with state election activity. The Alaska Republican Party states that it maintains another account entitled "Federal Fund '84". This account is used in connection with federal election activity. The Alaska Republican Party states that the similarity of the names of these two accounts lead it to erroneously inform Eklutna that the \$5,000 contribution was used in connection with a federal election. Additionally, the Party has provided a sworn statement from Mr. Alex that Eklutna's contribution was an unsolicited one.

II. LEGAL ANALYSIS

The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account of the Alaska Republican Party. The funds were used by a state account in connection with state activity. Thus, no corporate monies were contributed to or used in connection with a federal election.

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III. RECOMMENDATION

Find no probable cause to believe Eklutna Inc. violated
2 U.S.C. § 441b.

Date

Charles N. Steele
General Counsel

86030504761

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Eklutna, Inc.

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)
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MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna Inc., ("the Corporation") indicating that past officers may have permitted the Corporation to make a prohibited corporate contribution in connection with a federal election. The source of the Corporation's concern was a corporate check for \$5,000, payable to "Election '84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush campaign.

On December 3, 1985 the Commission found reason to believe that Eklutna Inc. violated 2 U.S.C. § 441b and approved interrogatories.

Responding to these interrogatories, the Corporation provided a sworn statement from its bookkeeper, which states an initial check was made out to "Reagan-Bush Campaign." This check was subsequently voided on the instructions of the Corporation's then President, Daniel Alex. At his direction a new check was written with "Election '84" as the payee. Mr. Alex was given this check for delivery.

86030604762

Additional information provided by other respondents indicates "Election '84" was an Alaska State account of the Alaska Republican Party. Its full title was "Alaska Election '84." The Eklutna check was subsequently deposited into the Alaska Election '84 account and expended in connection with state election activity. The Alaska Republican Party states that it maintains another account entitled "Federal Fund '84". This account is used in connection with federal election activity. The Alaska Republican Party states that the similarity of the names of these two accounts lead it to erroneously inform Eklutna that the \$5,000 contribution was used in connection with a federal election. Additionally, the Party has provided a sworn statement from Mr. Alex that Eklutna's contribution was an unsolicited one.

II. LEGAL ANALYSIS

The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account of the Alaska Republican Party. The funds were used by a state account in connection with state activity. Thus, no corporate monies were contributed to or used in connection with a federal election.

86030604763

III. RECOMMENDATION

Find no probable cause to believe Eklutna Inc. violated
2 U.S.C. § 441b.

Date

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street, Suite 302
Anchorage, AK 99501

RE: MUR 2108
Eklutna Inc.

Dear Mr. Wolf:

Based on information supplied by your client on August 27, 1985, the Commission determined on December 3, 1985, that there was reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable case to believe a violation has occurred.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8603060475



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER
SENSITIVE
26 APR 29 AIO: 57

April 29, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: MUR 2108

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on April 28, 1986. Following receipt of the Respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

86030604766



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

April 28, 1986

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street, Suite 302
Anchorage, AK 99501

RE: MUR 2108
Eklutna Inc.

Dear Mr. Wolf:

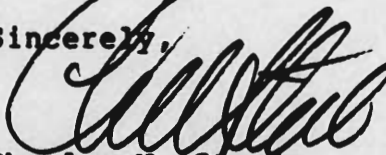
Based on information supplied by your client on August 27, 1985, the Commission determined on December 3, 1985, that there was reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Brief

86030604767

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Eklutna, Inc.

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MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna Inc., ("the Corporation") indicating that past officers may have permitted the Corporation to make a prohibited corporate contribution in connection with a federal election. The source of the Corporation's concern was a corporate check for \$5,000, payable to "Election '84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush campaign.

On December 3, 1985 the Commission found reason to believe that Eklutna Inc. violated 2 U.S.C. § 441b and approved interrogatories.

Responding to these interrogatories, the Corporation provided a sworn statement from its bookkeeper, which states an initial check was made out to "Reagan-Bush Campaign." This check was subsequently voided on the instructions of the Corporation's then President, Daniel Alex. At his direction a new check was written with "Election '84" as the payee. Mr. Alex was given this check for delivery.

86030604768

Additional information provided by other respondents indicates "Election '84" was an Alaska State account of the Alaska Republican Party. Its full title was "Alaska Election '84." The Eklutna check was subsequently deposited into the Alaska Election '84 account and expended in connection with state election activity. The Alaska Republican Party states that it maintains another account entitled "Federal Fund '84". This account is used in connection with federal election activity. The Alaska Republican Party states that the similarity of the names of these two accounts lead it to erroneously inform Eklutna that the \$5,000 contribution was used in connection with a federal election. Additionally, the Party has provided a sworn statement from Mr. Alex that Eklutna's contribution was an unsolicited one.

II. LEGAL ANALYSIS

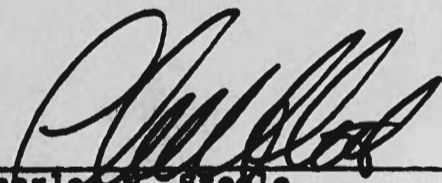
The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account of the Alaska Republican Party. The funds were used by a state account in connection with state activity. Thus, no corporate monies were contributed to or used in connection with a federal election.

86030504769

III. RECOMMENDATION

Find no probable cause to believe Eklutna Inc. violated
2 U.S.C. § 441b.

24 April 1986
Date



Charles N. Steele
General Counsel

86030604770



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1986

David Diepenbrock
The Republican Party of Alaska
P.O. Box 104963
Anchorage, Alaska 94150

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

Based on information supplied by Eklutna Inc. on August 27, 1985 the Commission determined on December, 3, 1985, that there was reason to believe that the Republican Party of Alaska had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

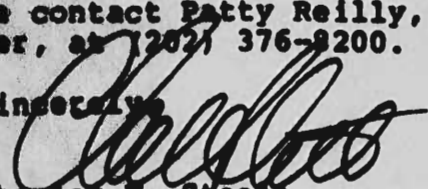
After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

86030604771

Should you have any questions, please contact Patty Reilly,
the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

86030304772

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Republican Party of Alaska) MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna, Inc. ("the Corporation") indicating the Corporation may have made a prohibited corporate contribution to a federal political committee. The source of the Corporation's concern was a corporate check for \$5,000 payable to "Election 84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush Campaign.

On December 3, 1985 the Commission found reason to believe the Alaska Republican Party violated 2 U.S.C. § 441b. On this date the Commission also approved interrogatories for the Corporation and the Alaska Republican Party ("The Party").

Responses from the Party reveal it maintained six separate accounts; two for federal election activity and the remainder for state election activity. One federal account was called "Federal Fund '84". One state account was referred to as "Alaska Election '84." The Alaska Republican Party states that it was the similarity of these names which lead it to initially respond to the Corporation's inquiry by stating that the contribution in question was used for federal election activity.

The Party contends that the \$5,000 contribution from Eklutna was an unsolicited contribution deposited into the state account

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and used for state election activity. The Party offers the following evidence to support this contention.

First, the Party offers sworn statement of its current executive director that Alaska Election '84 was a state account used for state activity and that Federal Fund '84 consisted of only permissible funds. A review of Federal Funds reports on file with the Commission supports this statement. Second, the Party has provided a copy of the bank depository slip for Alaska Election '84 that lists this state account's deposit of the Eklutna contribution. Additionally, the monthly statement of Alaska Election '84 for the month of June 1984 has been provided which lists the total amount on this deposit slip as entering the Alaska Election '84 account. Fourth, respondents have provided a copy of its state accounts ledgers which also report the Eklutna contribution as entering the state account. Finally, the Party enclosed a portion of its Alaska state reports in which the Eklutna contribution is reported.

II. LEGAL ANALYSIS

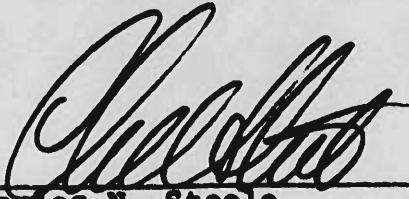
The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account. The funds were used in connection with state election activity. Thus, no corporate monies were used in connection with a federal election.

85030604774

III. RECOMMENDATIONS

Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b.

26 April 1966
Date



Charles N. Steele
General Counsel

86030604775



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

*Goel
Docket*
SENSITIVE

CC 122 29 AIO: 57

April 29, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: MUR 2108

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on April 28, 1986. Following receipt of the Respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

86030604776



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1986

David P. Wolf, Esquire
Copeland, Landye, Bennett & Wolf
420 L Street, Suite 302
Anchorage, AK 99501

RE: MUR 2108
Eklutna Inc.

Dear Mr. Wolf:

Based on information supplied by your client on August 27, 1985, the Commission determined on December 3, 1985, that there was reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".
Charles N. Steele
General Counsel

Enclosure
Brief

86030604777

Additional information provided by other respondents indicates "Election '84" was an Alaska State account of the Alaska Republican Party. Its full title was "Alaska Election '84." The Eklutna check was subsequently deposited into the Alaska Election '84 account and expended in connection with state election activity. The Alaska Republican Party states that it maintains another account entitled "Federal Fund '84". This account is used in connection with federal election activity. The Alaska Republican Party states that the similarity of the names of these two accounts lead it to erroneously inform Eklutna that the \$5,000 contribution was used in connection with a federal election. Additionally, the Party has provided a sworn statement from Mr. Alex that Eklutna's contribution was an unsolicited one.

II. LEGAL ANALYSIS

The Act prohibits corporations from making a contribution in connection with a federal election from their general treasury funds. 2 U.S.C. § 441b. In this instance a corporation contributed to a state account of the Alaska Republican Party. The funds were used by a state account in connection with state activity. Thus, no corporate monies were contributed to or used in connection with a federal election.

86030604778



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1986

David Diepenbrock
The Republican Party of Alaska
P.O. Box 104963
Anchorage, Alaska 94150

RE: MUR 2108
The Republican Party of
Alaska

Dear Mr. Diepenbrock:

Based on information supplied by Eklutna Inc. on August 27, 1985 the Commission determined on December, 3, 1985, that there was reason to believe that the Republican Party of Alaska had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your client's position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

86030504779

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Republican Party of Alaska) MUR 2108

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose from a letter received by the Office of the General Counsel from Eklutna, Inc. ("the Corporation") indicating the Corporation may have made a prohibited corporate contribution to a federal political committee. The source of the Corporation's concern was a corporate check for \$5,000 payable to "Election 84" and endorsed by the Republican Party of Alaska. The check stub indicated this check was a contribution to the Reagan-Bush Campaign.

On December 3, 1985 the Commission found reason to believe the Alaska Republican Party violated 2 U.S.C. § 441b. On this date the Commission also approved interrogatories for the Corporation and the Alaska Republican Party ("The Party").

Responses from the Party reveal it maintained six separate accounts; two for federal election activity and the remainder for state election activity. One federal account was called "Federal Fund '84". One state account was referred to as "Alaska Election '84." The Alaska Republican Party states that it was the similarity of these names which lead it to initially respond to the Corporation's inquiry by stating that the contribution in question was used for federal election activity.

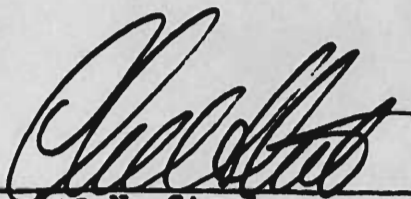
The Party contends that the \$5,000 contribution from Eklutna was an unsolicited contribution deposited into the state account

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III. RECOMMENDATIONS

Find no probable cause to believe the Republican Party of Alaska violated 2 U.S.C. § 441b.

26 April 1986
Date



Charles N. Steele
General Counsel

86030304781

The Republican Party of Alaska

P.O. Box 104963
Anchorage, AK 99510
(907) 276-4467



RECEIVED THE FEC
Acc # 9981
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RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2108
The Republican Party
of Alaska

Dear Mr. Steele:

Enclosed you will find a response to the specific questions that your office has posed to the Republican Party of Alaska, together with some supporting documentation.

Having reviewed the letter that was sent by my predecessor to Eklutna, Inc., I can understand your concern. However, it is my happy task to be able to set your concerns to rest. My predecessor, David Woodson, appears to have confused two accounts of the Republican Party of Alaska. The source of his confusion may stem from the fact that these two accounts both have the word "84" in their names.

Additionally, these two accounts share some other similarities. They were both recorded in the same check ledger by the staff secretary of the Republican Party of Alaska. They both have Jim Crawford and Eldon Ulmer, who is the National Committeeman of the Republican Party of Alaska as their Finance Chairmen.

In fact, however, they have two different functions. Election 84 can be thought of in shorthand as paying the salaries of workers at Republican Party of Alaska headquarters. Federal Funds 84 can be similarly be described as mainly supporting a state party database to be used by a phonebank effort.

Election 84 was always considered to be an account that should be reported to the State of Alaska's Alaska Public Offices Commission. Federal Funds 84 was considered to be reportable to the Federal Election Commission.

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The Republican Party of Alaska did not receive corporate contributions directed to Reagan-Bush 84. This specifically includes the Eklutna contribution.

In the manner explained in our answer to your specific interrogatory, no corporate contributions to the Republican Party of Alaska were expended for the specific purpose of reelecting President Reagan, and as stated, this specifically includes the Eklutna contribution. We did engage in party building type activities that, by their nature, could have tended to aid all candidates on the Republican ticket.

In reviewing my predecessor's letter I can only conclude that I wish it had not been written because it so totally misstated the realities of the case.

Let me attest that, to the best of my knowledge, the statements contained in the succeeding four pages that are direct answers to your interrogatory questions are true. In developing those answers I have spoken to my predecessor, David Woodson, and to Jim Crawford, and Daniel Alex. I have reviewed the check ledgers of all three accounts that I have been able to find. I have searched through our files to find supporting documentation.

With the interrogatories, you will find a copy of the cover of the confusing check ledger, a copy of the page that records the deposit of the check under question, a notarized letter signed by Daniel Alex, a copy of the check deposit, a copy of the expenditures by the Republican Party of Alaska general account that were to be reimbursed by Election 84, and a copy of the relevant page of our correct filing of this contribution with the Alaska Public Offices Commission.

In conclusion, let me thank you for your patience. Particularly, let me thank Patty Reilly who walked me through the details of the proper way to respond to your request.

On the 10th day of March, 1986, before me, a Notary Public in and for the State of Alaska, personally appeared David W. Diepenbrock, known to me to be the person who executed the above transaction, and he acknowledged to me that he had the authority to and did sign the same voluntarily and of his own free will for the purposes stated therein.

IN WITNESS THEREOF, I have set my hand and seal the day and year above written.

Deane Wilson

Notary Public in and for the State of Alaska
My Commission expires 6-22-87

Yours sincerely,

David W. Diepenbrock
David W. Diepenbrock
Executive Director
Republican Party
of Alaska



1. During 1984, did the Republican Party of the State of Alaska maintain a checking account called "Election '84"?

ANSWER: Yes, we did maintain such an account. Its technical title was: REPUBLICAN PARTY OF ALASKA Alaska Election Fund 84 General Accounts.

1 (a) Why was this account established?

ANSWER: This account was established to provide contact with Party workers (e.g., precinct committee people), support costs attendant upon the 1984 Alaska Republican State Convention, and pay the salaries of some individuals working in the Republican Party of Alaska state headquarters.

1 (b) What individuals controlled this account?

ANSWER: As with all party accounts, both federal and general, the person who authorized expenditures from this account was the State Party Chairman at the time, Ken Stout. The staff (not elected) party secretary received, recorded and deposited any contributions. These expenditures and deposited were formally reported by the elected Party Treasurer, Pat Evarts.

1 (c) How contributions to this account were solicited?

ANSWER: Contributions to this account came from a direct mailing, from personal solicitation and from fundraising events. Those who were asked for contributions included former donors to the state party and those actively involved in supporting Republican candidates in the past.

1 (d) Whether this account was used for federal election, state election, or state party purposes?

ANSWER: The Election 84 account was used for state party purposes.

1 (d) 5 If state party, for what activities was this account used?

ANSWER: This account paid some of the wages and expenses of employees. It provided office equipment for the state party. It paid for adding telephone numbers to the Alaska voter file. It paid for appropriate expenses of the State Convention. It paid for fundraising expenses. The preceding list is, while not complete, a representative sample of the expenses as revealed by the check and deposit register that reports the Election 84 activity.

1 (e) What other accounts were maintained by the Republican Party of Alaska during the 1984 election year?

ANSWER: The state maintained both federal accounts and state accounts. Federal accounts were reported to the Federal Election Commission; state accounts (often called general accounts) were reported to the Alaska Public Offices Commission.

ANSWER:

Known federal accounts included:

United Republican Fund (referred to also as Federal Fund), Fairbanks
Federal Funds '84 (formal title: Election 84 Federal Acct),
Anchorage *

* This account was reported to both the FEC and APOC, according to Pat Evarts.

Known state accounts included:

Alaska Election Fund 84, Anchorage
Republican Party of Alaska Elephant Club, Anchorage
Republican Party of Alaska (usually called the General Account),
Anchorage
Convention Account, Fairbanks

1 (f) For what purposes were each of the accounts listed in your response to (e) used for?

ANSWER:

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- a. United Republican Fund, Fairbanks: This fund was used to support district party organizations and for general support of the state party. It was under the direction and control of Mary Elizabeth Lomen, the State Party Treasurer (and subsequently the State Party Assistant Treasurer). After expenses were paid, half of each individual's contributions were sent to their respective district. Remaining funds were transferred to the Republican Party of Alaska account.
- b. Federal Funds '84: This fund was used to mail notification of precinct caucuses to Republican voters, for some salaries and benefits of employees, for adding telephone numbers to the Alaska voter file, and for some computer service bureau services.
- c. Alaska Election Fund 84: This is the Election 84 account already described in 1 (a) through (d).
- d. Republican Party of Alaska Elephant Club: This fund was used for support of the state party and state legislative candidates. It is distinct from the succeeding account in that it received funds from major donors to the state party.
- e. Republican Party of Alaska: This fund was used for day to day operations of the party and for support of state legislative candidates. It accepted funds from direct mail donors and attendees at fundraising events.
- f. Convention Account: This account was created to handle delegate and alternate fees received from attendees to the state convention in Fairbanks and to pay for expenses of the state convention.

1 (g) Whether the "Election '84" account was used in coordination or conjunction with any other accounts of the Republican Party of Alaska, or any federal accounts?

ANSWER: No documents have been found on file that would indicate any formal statement of coordination between the Election 84 account and other accounts. It and Federal Funds 84 would appear on their face to be single year accounts, used only in the election of 1984. Election 84 does appear, upon examining the various available account ledgers, to interface with the state party's general account in that Election 84 regularly reimburses the general account for payroll taxes.

2. On June 14, 1984, Eklutna, Inc. contributed \$5,000 to the "Election '84" account. Regarding that contribution, please state:

2 (a) When this contribution was received by "Election '84"?

ANSWER: The check is dated June 14, and the deposit ticket that went to the bank with the check is dated June 15. Conjecturally, therefore, it is possible to suggest that the check was received one of those two days.

2 (b) Who solicited this contribution?

ANSWER: In a personal conversation with Daniel Alex, he stated that the contribution was an unsolicited one, and that as an active Republican, he was aware of the need for funds for the Republican Party of Alaska and decided to offer the donation. While he is not listed as part of the fundraising team assembled to gather funds for Election 84, he said that he himself was helping to raise money for the party and became aware of the need through that channel.

2 (c) Whether anyone representing "Election '84" spoke with Daniel Alex regarding the intended use of this contribution?

ANSWER: Mr. Alex stated that he did not discuss with anyone the specific use of the contribution.

2 (d) Whether Daniel Alex requested this contribution be used in support of any particular candidates, and if so, which candidates?

ANSWER: Mr. Alex stated that he did not discuss directing his contribution to any particular candidate or candidates.

2 (e) Whether this contribution was reported to the Federal Election Commission, and if so, where?

ANSWER: No, it was not reported to the Federal Election Commission.

2 (f) Whether this contribution was expended on behalf of Reagan-Bush?

ANSWER: An examination of the check register reveals one expenditure made after the Eklutna check could have been received that carries the words Reagan-Bush or initials to that effect. It is:

June 15 Repub. Party of AK R/B payback check 1051 2446.99

All further entries are as described in the answer to question 1 (d) 5. The entry listed as "R/B payback" is repayment to the Republican Party of Alaska for salaries and office supplies that were advanced to the Election 84 account by the Republican Party of Alaska. They fall clearly into the same type of expenditures that were covered in the description of Election 84 expenditures.

2 (g) Whether this contribution was expended on behalf of any other federal candidates?

ANSWER: No this contribution was not expended on behalf of any other federal candidate.

8 6 0 3 0 5 0 4 7 8 7

David Diepenbrock
Executive Director
Republican Party of Alaska
300 W. 5th Ave.
Anchorage, AK 99501

March 10, 1986

Dear Dave,

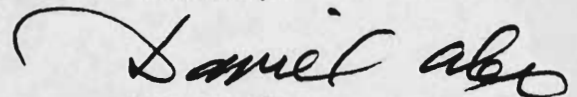
You had asked me who asked for the donations from Eklutna and what purpose it was going for.

Let me say as the past President of Eklutna that no one asked us for the money, and the issue of what it would be used for was never raised.

Eklutna had a policy of donating money to various political causes, Republican and Democratic. Our budget for political contributions was probably in excess of \$30,000.

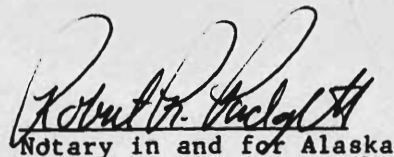
I hope this answers your questions.

Sincerely,



Daniel Alex
Dan Alex & Assoc.

The foregoing instrument was acknowledged before me this 10th day of March, 1986 by DANIEL ALEX.



Notary in and for Alaska

My Commission Expires: November 9, 1988

36030604788

MEMORANDUM

FROM: Hope Nelson

DATE: February 10, 1984

TO: Jim Crawford
Ken Stout
Dave Woodson

RE: Funds Owed Republican Party of Alaska General Account

\$ 750.00	October Salary - Dave Woodson
1,500.00	November Salary - Dave Woodson
6,000.00	November & December Salary - Hope Nelson
1,400.00	October Salary Gail Fritts
147.00	Supplies
38.60	Postage
300.00	Rent for December (rent includes signs in windows and
300.00	Rent for January liability insurance)
300.00	Rent for February
32.80	Copy Paper
30.00	Supplies
20.00	Rolls
54.40	Postage
250.00	Copier and office equipment and furniture
75.00	Janitorial, including windows
\$11,197.80	Sub-total
3,475.00	Down Payment for Copier
995.07	Taxes Paid
\$ 6,727.73	Total Owed

85030504789

Republican Party of Hawaii
(NAME OF CANDIDATE OR GROUP)

Check one: ☒ 30 Day, ☐ 7 Day, ☐ 10 Day, ☐ Year-end
Check one: ☒ Primary ☐ General 198 4
(Please check box ☐ if fund-raiser form on reverse side was used.)

INSTRUCTIONS: In Part I itemize the contributors who have given more than \$100 to the campaign. Refunds are to be shown as a negative figure in brackets () and subtracted from other contributions. The Summary in Part II shows personal contributions from the candidate, the total of contributions of \$100 or less, and the sub-total of Part I.

PART 1.

[illegible]

PART 2. SUMMARY

SUB-TOTAL

10,700 -

- | | | |
|--|----|----------|
| 1. CANDIDATE'S PERSONAL CONTRIBUTIONS THIS PERIOD | \$ | <u>5</u> |
| 2. TOTAL OF CONTRIBUTIONS FROM OTHERS OF \$100 OR LESS THIS PERIOD | | |
| Number of Contributors () | | <u>6</u> |
| 3. TOTAL OF CONTRIBUTIONS FROM OTHERS OVER \$100 THIS PERIOD | \$ | |
| 4. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (add lines 1, 2 and 3) | \$ | |

For this total on line 1, Column B, Summary P

8 Dec 84

REPUBLICAN PARTY OF ALASKA
GENERAL ACCT
PO BOX 104963
ANCHORAGE

AK 90501

30
4
8
AVG ANNUAL BAL
AVG PAID BALANCE
1,835.13
1,285.13

A STATEMENT OF YOUR
CHECKING ACCOUNT NO. 2654601

TAX ID NUMBER 02-0039681
PAGE 1
01/31/84 through 06/29/84

700.74 + 4 8,920.00 5,812.02 = 3,708.74

DATE	DESCRIPTION	DEBIT	CREDIT	BALANCE
06/29/84	DEPOSIT		500.00 ✓	700.76
06/11/84			06/11/84	200.76
06/06/84			06/06/84	700.76
06/01/84			06/01/84	259.76
05/19/84			05/19/84	450.34
05/18/84			05/18/84	8,159.34
05/15/84			05/15/84	7,040.34
05/11/84			05/11/84	4,602.35
05/08/84			05/08/84	4,521.88
05/04/84			05/04/84	4,021.88
05/01/84			05/01/84	4,421.88
04/26/84			04/26/84	4,300.52
04/26/84			04/26/84	2,708.74

90.27 1057 591.78
121.36
470.42
500.00
1,101.00
500.00
1057

DEPOSIT TICKET

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY
ENDORSED. LIST EACH CHECK SEPARATELY.
Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement. All credits for items are provisional until collected.

DATE 15 June 84

	DOLLARS	CENTS
CURRENCY		
COIN		
CHECKS		
1 7166	5,000	00
2 002521	2500	00
TOTAL	7,500	00

1500 00



Bank of America
1016 W. NORTHERN LIGHTS BLVD.
ANCHORAGE, ALASKA 99503

01 AED 04 011

7,500.00

00 JUN 15 1984
DEPOSIT

1,500.00

REPUBLICAN PARTY OF ALASKA
ALASKA ELECTION FUND 84
GENERAL ACCOUNTS

125200905:00 002454 501 002 000007500000

002454601 00200000750000

1 4 0 3 0 3 0 8

FORM F

Election '84

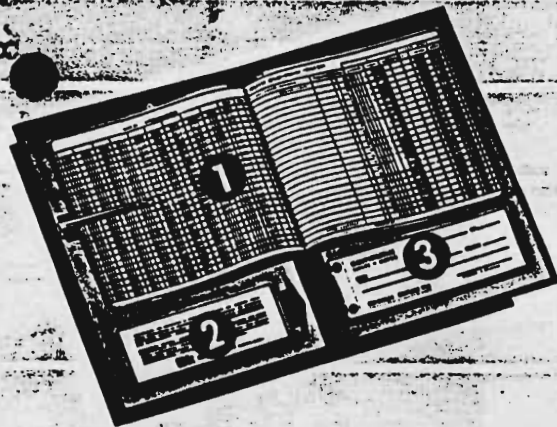
Federal Funds '84



ekonomik

CHECK REGISTER

10/1/15



USE ALL 3 UNITS FOR COMPLETE BUSINESS CHECKBOOK

1. REGISTER Records 25 check to page — 1,000 in total.
2. BINDERS: Designed especially for Ekonomik Register and Checks.
3. CHECKS: Large business size with small perforated end stub.

PRODUCT OF ekonomik® SYSTEMS P. O. BOX 11413, TACOMA, WASHINGTON 98411

ACCOUNT NAME _____

BANK _____

FROM _____ 19 _____ TO _____ 19 _____

CHECK NUMBERS _____ TO _____

GCC# 9940

The Republican Party of Alaska

P.O. Box 104963
Anchorage, AK 99510
(907) 276-4467



36 MAR 11 A 9:02

RECEIVED

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2108
The Republican Party
of Alaska

Dear Mr. Steele:

Enclosed you will find a response to the specific questions that your office has posed to the Republican Party of Alaska, together with some supporting documentation.

Having reviewed the letter that was sent by my predecessor to Eklutna, Inc., I can understand your concern. However, it is my happy task to be able to set your concerns to rest. My predecessor, David Woodson, appears to have confused two accounts of the Republican Party of Alaska. The source of his confusion may stem from the fact that these two accounts both have the word "84" in their names.

Additionally, these two accounts share some other similarities. They were both recorded in the same check ledger by the staff secretary of the Republican Party of Alaska. They both have Jim Crawford and Eldon Ulmer, who is the National Committeeman of the Republican Party of Alaska as their Finance Chairmen.

In fact, however, they have two different functions. Election 84 can be thought of in shorthand as paying the salaries of workers at Republican Party of Alaska headquarters. Federal Funds 84 can be similarly be described as mainly supporting a state party database to be used by a phonebank effort.

Election 84 was always considered to be an account that should be reported to the State of Alaska's Alaska Public Offices Commission. Federal Funds 84 was considered to be reportable to the Federal Election Commission.

1. During 1984, did the Republican Party of the State of Alaska maintain a checking account called "Election '84"?

ANSWER: Yes, we did maintain such an account. Its technical title was: REPUBLICAN PARTY OF ALASKA Alaska Election Fund 84 General Accounts.

1 (a) Why was this account established?

ANSWER: This account was established to provide contact with Party workers (e.g., precinct committee people), support costs attendant upon the 1984 Alaska Republican State Convention, and pay the salaries of some individuals working in the Republican Party of Alaska state headquarters.

1 (b) What individuals controlled this account?

ANSWER: As with all party accounts, both federal and general, the person who authorized expenditures from this account was the State Party Chairman at the time, Ken Stout. The staff (not elected) party secretary received, recorded and deposited any contributions. These expenditures and deposited were formally reported by the elected Party Treasurer, Pat Evarts.

1 (c) How contributions to this account were solicited?

ANSWER: Contributions to this account came from a direct mailing, from personal solicitation and from fundraising events. Those who were asked for contributions included former donors to the state party and those actively involved in supporting Republican candidates in the past.

1 (d) Whether this account was used for federal election, state election, or state party purposes?

ANSWER: The Election 84 account was used for state party purposes.

1 (d) 5 If state party, for what activities was this account used?

ANSWER: This account paid some of the wages and expenses of employees. It provided office equipment for the state party. It paid for adding telephone numbers to the Alaska voter file. It paid for appropriate expenses of the State Convention. It paid for fundraising expenses. The preceding list is, while not complete, a representative sample of the expenses as revealed by the check and deposit register that reports the Election 84 activity.

1 (e) What other accounts were maintained by the Republican Party of Alaska during the 1984 election year?

ANSWER: The state maintained both federal accounts and state accounts. Federal accounts were reported to the Federal Election Commission; state accounts (often called general accounts) were reported to the Alaska Public Offices Commission.

ANSWER:

Known federal accounts included:

United Republican Fund (referred to also as Federal Fund), Fairbanks
Federal Funds '84 (formal title: Election 84 Federal Acct),
Anchorage *

* This account was reported to both the FEC and APOC, according to Pat Evarts.

Known state accounts included:

Alaska Election Fund 84, Anchorage
Republican Party of Alaska Elephant Club, Anchorage
Republican Party of Alaska (usually called the General Account),
Anchorage
Convention Account, Fairbanks

1 (f) For what purposes were each of the accounts listed in your response to (e) used for?

ANSWER:

a. United Republican Fund, Fairbanks: This fund was used to support district party organizations and for general support of the state party. It was under the direction and control of Mary Elizabeth Lomen, the State Party Treasurer (and subsequently the State Party Assistant Treasurer). After expenses were paid, half of each individual's contributions were sent to their respective district. Remaining funds were transferred to the Republican Party of Alaska account.

b. Federal Funds '84: This fund was used to mail notification of precinct caucuses to Republican voters, for some salaries and benefits of employees, for adding telephone numbers to the Alaska voter file, and for some computer service bureau services.

c. Alaska Election Fund 84: This is the Election 84 account already described in 1 (a) through (d).

d. Republican Party of Alaska Elephant Club: This fund was used for support of the state party and state legislative candidates. It is distinct from the succeeding account in that it received funds from major donors to the state party.

e. Republican Party of Alaska: This fund was used for day to day operations of the party and for support of state legislative candidates. It accepted funds from direct mail donors and attendees at fundraising events.

f. Convention Account: This account was created to handle delegate and alternate fees received from attendees to the state convention in Fairbanks and to pay for expenses of the state convention.

1 (g) Whether the "Election '84" account was used in coordination or conjunction with any other accounts of the Republican Party of Alaska, or any federal accounts?

ANSWER: No documents have been found on file that would indicate any formal statement of coordination between the Election 84 account and other accounts. It and Federal Funds 84 would appear on their face to be single year accounts, used only in the election of 1984. Election 84 does appear, upon examining the various available account ledgers, to interface with the state party's general account in that Election 84 regularly reimburses the general account for payroll taxes.

2. On June 14, 1984, Eklutna, Inc. contributed \$5,000 to the "Election '84" account. Regarding that contribution, please state:

2 (a) When this contribution was received by "Election '84"?

8 ANSWER: The check is dated June 14, and the deposit ticket that went to
9 the bank with the check is dated June 15. Conjecturally, therefore, it is
possible to suggest that the check was received one of those two days.

2 (b) Who solicited this contribution?

ANSWER: In a personal conversation with Daniel Alex, he stated that the
contribution was an unsolicited one, and that as an active Republican, he
was aware of the need for funds for the Republican Party of Alaska and
decided to offer the donation. While he is not listed as part of the
fundraising team assembled to gather funds for Election 84, he said that
he himself was helping to raise money for the party and became aware of
the need through that channel.

2 (c) Whether anyone representing "Election '84" spoke with Daniel Alex
regarding the intended use of this contribution?

ANSWER: Mr. Alex stated that he did not discuss with anyone the specific
use of the contribution.

2 (d) Whether Daniel Alex requested this contribution be used in support
of any particular candidates, and if so, which candidates?

ANSWER: Mr. Alex stated that he did not discuss directing his
contribution to any particular candidate or candidates.

2 (e) Whether this contribution was reported to the Federal Election
Commission, and if so, where?

ANSWER: No, it was not reported to the Federal Election Commission.

2 (f) Whether this contribution was expended on behalf of Reagan-Bush?

ANSWER: An examination of the check register reveals one expenditure made after the Eklutna check could have been received that carries the words Reagan-Bush or initials to that effect. It is:

June 15 Repub. Party of AK R/B payback check 1051 2446.99

All further entries are as described in the answer to question 1 (d) 5. The entry listed as "R/B payback" is repayment to the Republican Party of Alaska for salaries and office supplies that were advanced to the Election 84 account by the Republican Party of Alaska. They fall clearly into the same type of expenditures that were covered in the description of Election 84 expenditures.

2 (g) Whether this contribution was expended on behalf of any other federal candidates?

ANSWER: No this contribution was not expended on behalf of any other federal candidate.

86030504799

David Diepenbrock
Executive Director
Republican Party of Alaska
300 W. 5th Ave.
Anchorage, AK 99501

March 10, 1986

Dear Dave,

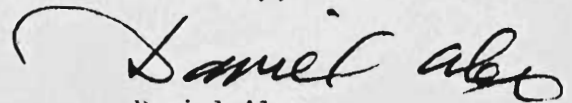
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Let me say as the past President of Eklutna that no one asked us for the money, and the issue of what it would be used for was never raised.

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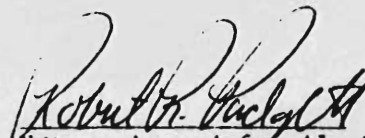
I hope this answers your questions.

Sincerely,



Daniel Alex
Dan Alex & Assoc.

The foregoing instrument was acknowledged before me this 10th day of March, 1986 by DANIEL ALEX.



Notary in and for Alaska
My Commission Expires: November 9, 1988

REPUBLICAN PARTY OF ALASKA
GENERAL ACCT
P.O. BOX 10 4063
ANCHORAGE

AK 00501

A STATEMENT OF YOUR
CHECKING ACCOUNT NO.

PAY TO ORDER OF 02-0120651
PAGE 1

01/15/84 through

DATE	DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	BALANCE
01/15/84	OPENING BALANCE			2,200.00
01/15/84	CHECK	500.00		1,700.00
01/15/84	CHECK	500.00		1,200.00
01/15/84	CHECK	475.00		725.00
01/15/84	DEPOSIT		2,500.00	3,225.00
01/15/84	CHECK	1,100.00		2,125.00
01/15/84	CHECK	2,450.00		(325.00)
01/15/84	CHECK	80.00		(405.00)
01/15/84	CHECK	500.00		(905.00)
01/15/84	DEPOSIT		400.00	(505.00)
01/15/84	CHECK	125.54		(630.54)
01/15/84	CHECK	500.00		(1,130.54)

500.00
125.54
175.54
100.00
2,200.00
1,000.00
1,200.00

09 90 1252

DEPOSIT TICKET

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY
ENDORSED. LIST EACH CHECK SEPARATELY.
Currency and Coin Deposits Subject to the
Reserve Bank of Alaska's Cash Management
Program. All Funds are subject to the
Reserve Bank of Alaska's Cash Management
Program.

DATE: 01/15/84
CURRENCY

COIN
CHECKS
7/06
5,000.00
5,000.00



Alaska Continental Bank
1015 W. NORTHEN LIGHTS BLVD.
ANCHORAGE, ALASKA 99503

REPUBLICAN PARTY OF ALASKA

ALASKA ELECTION FUND 84
GENERAL ACCOUNTS

01 ACB 04 011

2,500.00

TOTAL DEPOSIT

1,500.00

012520040500 002151 60 01 002 00000750000

012520 0139

0024546010

002000075000

86030604801

AMOUNTS FORWARD					
10 May 84	Hape Wilson	reimag	1042	100980	135
10 May 84	Rep Party of Alaska	reimbursement	1043	122020	11
23 May 84	Deposit	Electric & mail	-		80000 9
23 May 84	Barthel Perry	Severance Pay	1044	18480	7
25 May 84	Lisa Hopkins	Computerized	1045	50000	2
	Deposit	T.C. Electric 34	-		52000 7-
	Municipality of Anch	Phone books	1046	47042	2
12 June 84	Marketing Comm	Plate letter	1047	8047	1
	Deposit	Mailman	-		40000 50
	Deposit	Electric & mail	-		75000 808
12 June 84	Backpack Fine Titles	Street maps	1048	4500	804
12 June 84	Hape Wilson	Salary	1049	110100	694
12 June 84	John Baker	Salary	1050	50000	644
12 June 84	Republican Party of AK	R/B Daybook	1051	244699	399
2 June	Deposit	mailman	-		40000 439
2 June	Republican Party	data back-up	1052	12136	427
2 June	Municipality of Anch	Phone books	1053	59178	347
2 June	Jayco	reimbursement	1054	10000	306
2 June	John Baker	Wages	1055	50000	556
2 June	Void		1056		
2 June	Hape Wilson	reimag	1057	40880	215
	2 RPA		1058	35000	
	John Baker		1059	50000	
24 June	John Baker	Salary	1060	50000	
24 June	Adrian Berglund	Salary	1061	50000	13
Total				250107	

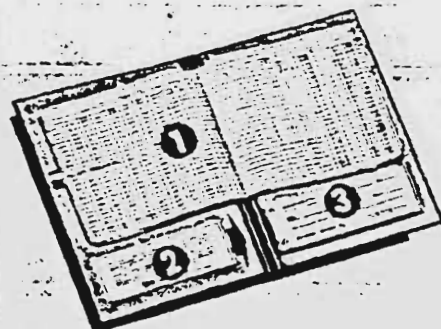
20870908098

8 6 0 3 0 6 0 4 8 0 3

FORM F

Election '84

Federal Funds '84



USE ALL **3** UNITS FOR COMPLETE BUSINESS CHECKBOOK

- 1. REGISTER: Records 25 checks to page — 1,000 in total
- 2. BINDERS: Designed especially for Ekonomik Register and Checks
- 3. CHECKS: Large business size with small perforated end stub

PRODUCT OF EKONOMIK® SYSTEMS P.O. BOX 11413, TACOMA, WASHINGTON 98411



ekonomik

CHECK REGISTER

FORM F

ACCOUNT NAME _____

BANK _____

FROM: _____ 19____ TO _____ 19____

CHECK NUMBERS _____ TO _____

MEMORANDUM

FROM: Hope Nelson

DATE: February 10, 1984

TO: Jim Crawford
Ken Stout
Dave Woodson

RE: Funds Owed Republican Party of Alaska General Account

\$ 750.00	October Salary - Dave Woodson
1,500.00	November Salary - Dave Woodson
6,000.00	November & December Salary - Hope Nelson
1,400.00	October Salary Gail Fritts
147.00	Supplies
38.60	Postage
300.00	Rent for December (rent includes signs in windows and
300.00	Rent for January liability insurance)
300.00	Rent for February
32.80	Copy Paper
30.00	Supplies
20.00	Rolls
54.40	Postage
250.00	Copier and office equipment and furniture
75.00	Janitorial, including windows
\$11,197.80	Sub-total
3,475.00	Down Payment for Copier
995.07	Taxes Paid
\$ 6,727.73	Total Owed

86030604804

STATE CAMPAIGN MONETARY CONTRIBUTIONS

Schedule C

APOC FORM 15-3C-S

Republican Party of Nevada
(NAME OF CANDIDATE OR GROUP)

Check one: ☒ 30 Day, ☐ 7 Day, ☐ 10 Day, ☐ Year-end
Check one: ☒ Primary ☐ General 198 4
(Please check box ☐ if fund-raiser form on reverse side was used.)

INSTRUCTIONS: In Part I itemize the contributors who have given more than \$100 to the campaign. Refunds are to be shown as a negative figure in brackets () and subtracted from other contributions. The Summary in Part II shows personal contributions from the candidate, the total of contributions of \$100 or less, and the sub-total of Part I.

PART 1.

DATE	CHECK NUMBER	NAME AND ADDRESS OF CONTRIBUTOR	OCCUPATION	EMPLOYER (if self-employed list name and address of business)	AMOUNT THIS PERIOD	Cum. AMT. EACH CONTRIB.
4/19/84	1094	Grace M. Mitchell Box 496 Pahrump 89572	Housewife	Personal Services Box 496 Pahrump 89572	1500 -	2000 -
4/18/84	4858	Fortune & Dickson 2841 W. Main Las Vegas 89104	Medical Equip	Same	1000 -	1000 -
12/31/83	1172	Edward Stendall 3585 Stanford Las Vegas 89158	Chief Engineer		200 -	200 -
2/1/84		Mike Stepha 6957 Old Grand Las Vegas 89102	Contractor	Stephen & Linda (In Grassm)	200 -	200 -
8/31/84	5205	Joseph Paul Kunitz 7780 Stewart St. Las Vegas 89112	Car Wash	Same	800 -	800 -
6/15/84	7166	Elkuta 840 E. W. Las Vegas 89101		Elkuta Las Vegas 89101	5000 -	5470 -
6/15/84	002521	Krakonen Co. 3305 Arto St. 200 Las Vegas 89103		Kraton Land Corp Same	2500 -	2500 -

PART 2. SUMMARY

SUB-TOTAL

10,700 -

- CANDIDATE'S PERSONAL CONTRIBUTIONS THIS PERIOD\$ 0
- TOTAL OF CONTRIBUTIONS FROM OTHERS OF \$100 OR LESS THIS PERIOD
Number of Contributors ()\$ 0
- TOTAL OF CONTRIBUTIONS FROM OTHERS OVER \$100 THIS PERIOD\$ 0
- TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (add lines 1, 2 and 3)\$ 0

(enter this total on line 1, Column B, Summary Page)

COPELAND, LANDYE, BENNETT AND WOLF

LAW OFFICES

420 L STREET, SUITE 302

ANCHORAGE, ALASKA 99501

(907) 276-5152

TELECOPIER (907) 277-4831

March 3, 1986

MARK G. COPELAND**
THOMAS M. LANDYE, P.C.
J. DAVID BENNETT, P.C.
DAVID R. WOLF*
ROBERT S. HOPKINS
RICHARD L. SADLER
RANDALL L. DUNN

JAMES S. CRANE*
ROBERT H. HUME, JR.**
MITCHEL R. COHEN
DAVID N. GOULDER
R. STEPHEN RUSSELL II
DIANE A. SMITH
ERIK LEROY*

COUNSEL
BURTON M. BENNETT, P.C.

OREGON OFFICE
3800 FIRST INTERSTATE TOWER
PORTLAND, OREGON 97201
(503) 224-4100

*ALASKA STATE BAR
**ALASKA STATE AND OREGON STATE BARS
ALL OTHERS OREGON STATE BAR ONLY

Patricia M. Reilly
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Reilly:

In response to the undated letter from Joan D. Aikens, Chairman of the Federal Election Commission to Leo Stephan, President of Eklutna, Inc., please find enclosed as we discussed the affidavit of Kathryn Love and the statement of designation of counsel.

Sincerely,

COPELAND, LANDYE, BENNETT and WOLF

David P. Wolf

DPWLKC:u

Enclosures

cc: Eklutna, Inc.

36 MAR 6

AIO: 10

M 2108

GCC# 9904

RECEIVED
MAR 6
P 1:50

8 6 0 3 0 6 0 4 8 07

AFFIDAVIT

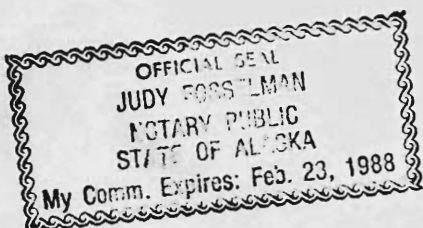
Kathryn Love, being first duly sworn, deposes and states:

1. I have been employed as a bookkeeper for Eklutna, Inc. since February 1, 1984.
2. I was the bookkeeper for Eklutna, Inc. on June 14, 1984.
3. Attached to this affidavit are true copies of Eklutna Check No. 7165 made out to the Reagan/Bush campaign for \$5,000.00 and Check No. 7166 made out to Election '84.
4. Daniel Alex, who on June 14, 1984, was President of Eklutna, Inc. requested that I prepare a check to Election '84 for the Reagan/Bush campaign for \$5,000.00. I prepared Check No. 7165 to the Reagan/Bush campaign and delivered it to Daniel Alex. Mr. Alex returned the check to me informing me that it should be made out to Election '84. I voided Check No. 7165 and made out a new check, No. 7166, payable to Election '84. I then returned the check to Daniel Alex.
5. Check No. 7166 was written on Eklutna, Inc.'s general account.

DATED this 28 day of February, 1986.

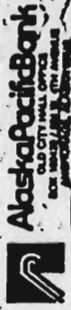
Kathryn Love
KATHRYN LOVE

SUBSCRIBED AND SWORN TO before me this 28th day of February, 1986.



Judy Foselman
Notary Public in and for Alaska
My Commission Expires: 2/23/88

EKLUTNA, INC.
840 K STREET, SUITE 202
ANCHORAGE, AK 99501



7165

89-87
1253

June 14, 19 84

DOLLARS \$5,000.00

PAY TO THE ORDER OF

Reagan - Bush Campaign

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$2,000.00

Samuel Alex

⑈007165⑈ ⑆125⑆00879⑆01 001458 6404

EKLUTNA, INC.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEM DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO REFUND DESIRED

DELUXE - FORM W003 V-2

DATE	DESCRIPTION	AMOUNT
6/14/84	political contribution	\$5,000.00

see ck # 7164

86030304809



EKLUTNA, INC.
840 K STREET, SUITE 202
ANCHORAGE, AK 99501



ALASKA PACIFIC BANK
BOX 10000 / 100 N. GAY AVENUE
ANCHORAGE, ALASKA 99501

7166

89-87
123

June 14, 1984

PAY TO THE ORDER OF \$5,000.00

PAY

DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

Election 84

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$5,000.00

Samuel Alex

⑈007166⑈ ⑆⑆125200879⑆0⑆ 001458 6⑈0⑆

⑈0000500000⑈

36 MAR 6 AIO: 10

STATEMENT OF DESIGNATION OF COUNSELMUR 2108NAME OF COUNSEL: David P. [REDACTED]ADDRESS: Copeland, Landye, Bennett
and WolfTELEPHONE: 420 L Street, Suite 302
Anchorage, Alaska 99501
(907) 276-5152

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Eklutna, Inc.

March 3, 1986
DateBy: Debbie Fullenwider
Signature Debbie Fullenwider,
Vice PresidentRESPONDENT'S NAME: Eklutna, Inc.ADDRESS: 550 W. 7th, Suite 1550
Anchorage, Alaska 99501HOME PHONE: N/ABUSINESS PHONE: (907) 276-5701

86030504810

GCC# 9585

PIERSON, BALL & DOWD

ATTORNEYS AT LAW

1200 18TH STREET, N.W.

WASHINGTON, D.C. 20036

(202) 331-8566

CABLE ADDRESS "PIERBALL"

TELEX NO. 64711

OKLAHOMA OFFICE
FIRST OKLAHOMA TOWER, SUITE 1310
210 W PARK AVENUE
OKLAHOMA CITY, OKLA. 73102
(405) 235-7886

M2108

JOHN J. DUFFY
(202) 457-8616

January 28, 1986

16 JAN 29 4 8:52

Charles N. Steele, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Patricia M. Riley, Esquire

Dear Mr. Steele:

We submit on behalf of Reagan-Bush '84 a copy of its responses to the interrogatories that accompanied your letter dated December 31, 1985.

If you have any questions concerning this matter, please don't hesitate to contact me.

Sincerely,

PIERSON, BALL & DOWD

John J. Duffy

JJD:dp
Enclosure
cc: Mr. Scott MacKenzie

86030504811

BEFORE THE
FEDERAL ELECTION COMMISSION

RESPONSE OF REAGAN-BUSH '84
TO INTERROGATORIES

Interrogatory No. 1

During 1984, did Reagan-Bush '84 maintain a checking account called "Election '84", and if yes, please state:

- (a) Why this account was established.
- (b) What individuals controlled this account.
- (c) How contributions to this account were solicited.
- (d) For what activities or purposes was this account used.
- (e) Whether the "Election '84" account was used in coordination or conjunction with any accounts of the Republican Party of Alaska, or any federal candidates.

Answer

Reagan-Bush '84 did not maintain a checking account called "Election '84".

Interrogatory No. 2

On June 14, 1984, Eklutna, Inc. contributed \$5,000 to the "Election '84" account. Regarding that contribution, please state:

- (a) When this contribution was received by "Election '84".
- (b) Who solicited this contribution.
- (c) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding the intended use of this contribution.

Answer

Reagan-Bush '84 did not maintain a checking account called "Election '84".

Respectfully submitted,

REAGAN-BUSH '84

By 
Scott MacKenzie
Assistant Treasurer

January 28, 1986

36030604813

GCC#9471

PIERSON, BALL & DOWD

ATTORNEYS AT LAW

1200 18TH STREET, N. W.

WASHINGTON, D. C. 20036

(202) 331-8566

CABLE ADDRESS "PIERBALL"

TELEX NO. 64711

OKLAHOMA OFFICE
FIRST OKLAHOMA TOWER, SUITE 1310
210 W. PARK AVENUE
OKLAHOMA CITY, OKLA. 73102
(405) 238-7888

JOHN J. DUFFY
(202) 457-8816

January 16, 1986

16 JAN 16 P 4: 15

RECEIVED
GENERAL COUNSEL

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

Re: MUR 2108

Dear Mr. Steele:

We request, on behalf of Reagan-Bush '84, an extension of time in which to respond to the interrogatories that were enclosed with your letter dated December 31, 1985. In your letter you asked Reagan-Bush '84 to respond to these interrogatories by January 20, 1986. We request an extension of time up to and including February 7, 1986.

Good cause exists for the extension requested. At the present time, Mr. Scott MacKenzie, the person to whom these interrogatories are addressed, has business commitments that require his presence in Los Angeles and is not able to consult with counsel until his return. The extension we request is short and will not, we expect, delay the Commission's investigation.

If you have any questions concerning this matter, please contact the undersigned.

Sincerely,
PIERSON, BALL & DOWD

John J. Duffy

JJD: dp

35030604814



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OGM 6079

January 15, 1986

David J. Woodson, Executive Director
The Republican Party of Alaska
300 W. 5th Avenue
Anchorage, Alaska 99501

RE: MUR 2108
Republican Party of Alaska

Dear Mr. Woodson:

On December 3, 1985, the Federal Election Commission determined there is reason to believe the Republican Party of Alaska violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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 the Republican Party of Alaska. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against the Republican Party of Alaska, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. 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).

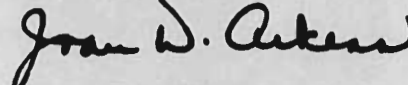
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

86030504815

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 Patricia M. Reilly, the attorney assigned to this matter at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Interrogatories
Commission Procedures
Designation of Counsel Statement

86030604816



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

February 25, 1986

David Diepenbrock
The Republican Party of Alaska
300 W. 5th Avenue
Anchorage, Alaska 99501

Re: MUR 2108
The Republican Party of Alaska

Dear Mr. Diepenbrock:

Pursuant to your February 18, 1986 conversation with this Office, enclosed please find a copy of the Commission's January 15, 1986 letter to the Republican Party of Alaska. Also enclosed are copies of the General Counsel's Factual and Legal Analysis and interrogatories authorized by the Commission.

In light of the fact that your time to answer these interrogatories has expired, they must be answered and returned immediately. Should you fail to do so, the Office of the General Counsel is prepared to seek a subpoena requiring you to respond.

If you have any questions please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

Commission letter
General Counsel's Factual and
Legal Analysis
Interrogatories
Designation of Counsel Form
Procedures

86030604817



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 15, 1986

Leo Stephan, President
Eklutna, Inc.
550 W. 7th, Suite 1550
Anchorage, Alaska 99501

RE: MUR 2108
Eklutna, Inc. and Daniel Alex,
as President in 1984

Dear Mr. Stephan:

On December 3, 1985, the Federal Election Commission determined there is reason to believe Eklutna, Inc. and Daniel Alex, as its President in 1984, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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, Eklutna, Inc. has an opportunity to demonstrate that no action should be taken against it and Daniel Alex. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against Eklutna, Inc., the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. 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).

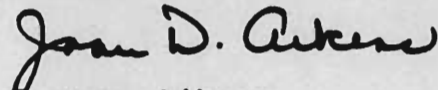
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8 6 0 3 0 5 0 4 8 1 8

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 Patricia M. Reilly, the attorney assigned to this matter at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Interrogatories
Commission Procedures
Designation of Counsel Statement

86030504819

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2108

RESPONDENT Eklutna, Inc. and Daniel Alex as President in 1984

SUMMARY OF ALLEGATIONS

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In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has received past corporate records of Eklutna, Inc. that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc. check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

Section 441b of the Federal Election Campaign Act prohibits corporations from using their treasury money to make

contributions or expenditures in connection with federal elections. The Office of General Counsel recommends there is reason to believe that Eklutna, Inc. and Daniel Alex, as its president in 1984, violated 2 U.S.C. § 441b by making a contribution of corporate funds to influence a federal election.

1/ Specifically, Eklutna, Inc. check no. 7166 is made payable to "Election '84", which appears to be an account from which money was expended to influence federal elections, namely.

1/ Eklutna, Inc., as a corporation chartered by the Alaska Native Claims Settlement Act, is subject to the prohibitions of 2 U.S.C. § 441b. See Advisory Opinion 1982-28.

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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For Eklutna, Inc.:

Pursuant to its investigation of MUR 2108, the Federal Election Commission requests that Eklutna, Inc. answer the following interrogatories. Please include any additional information or attach documents to your responses as you deem appropriate. Note that the Federal Election Campaign Act of 1971, as amended, defines the following term:

Contribution

Shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value...to any candidate, campaign committee or political party or organization, in connection with any election to (federal office)---2 U.S.C. § 441b(b)(2)

1. On June 14, 1984, Eklutna, Inc. issued, and later voided, check no. 7165. Regarding that check, please state:
 - (a) On who's request or knowledge the check was issued.
 - (b) For what reason or purpose the check was issued.
 - (c) On who's request or knowledge the check was voided.
 - (d) For what reason or purpose the check was voided.
2. On June 14, 1984, Eklutna, Inc. issued check no. 7166 for \$5,000 to "Election '84". Regarding that check, please state:
 - (a) On who's request or knowledge the check was issued.
 - (b) For what reason or purpose the check was issued.
 - (c) From what account the check was issued.
 - (d) What monies are normally deposited in the account from which the check was issued.
 - (e) Whether anyone from the Republican Party of Alaska solicited this check from Eklutna, Inc..
 - (f) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding their intended use of this contribution.

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- (h) Whether Daniel Alex requested this contribution be used in support of any particular candidates, and if so, which candidates.
- (i) Whether this contribution was reported to the Federal Election Commission, and if so, where.
- (j) Whether this contribution was expended on behalf of Reagan-Bush, or any other federal candidates.

86030504823

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Eklutna, Inc.) PRE-MUR 148
Daniel Alex)
Republican Party of Alaska)
Reagan-Bush '84)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 3, 1985, do hereby certify that the Commission took the following actions in PRE-MUR 148:

1. Decided by a vote of 4-2 to

- a) Open a MUR.
- b) Find reason to believe that Eklutna, Inc., and Daniel Alex as President of Eklutna, Inc. in 1984, violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

Commissioners Aikens, Harris, McDonald, and McGarry voted affirmatively for decision; Commissioners Elliott and Josefiak dissented.

2. Decided by a vote of 6-0 to find reason to believe that the Republican Party of Alaska violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

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

(continued)

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Federal Election Commission
Certification for PRE-MUR 148
December 3, 1985

Page 2

3. Decided by a vote of 5-1 to take no action at this time against the Reagan-Bush '84 Committee, but direct the FEC Office of General Counsel to the send interrogatories to the Committee for appropriate response.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Harris dissented.

4. Decided by a vote of 6-0 to

- a) Approve the General Counsel's Factual and Legal Analyses attached to the report dated November 8, 1985, subject to amendment of paragraph one to more accurately reflect the facts; and
- b) Direct the Office of General Counsel to send the appropriate letters pursuant to the Commission's decisions of this date.

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

Attest:

12-5-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2108

RESPONDENT Republican Party of Alaska
and Pat Evarts, as treasurer

SUMMARY OF ALLEGATIONS

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In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has received past corporate records of Eklutna, Inc. that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc. check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000.00 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

The Office of General Counsel recommends there is reason to believe that the Republican Party of Alaska violated 2 U.S.C. § 441b by knowingly accepting the Eklutna, Inc. contribution.

Section § 441b makes it unlawful for any political committee to knowingly accept or receive a prohibited corporate contribution. Based on the information provided to the Commission, the Republican Party of Alaska received and endorsed the corporate contribution. Further, the Party's reports filed with the Commission indicate that it maintained an account called "Election '84", but do not disclose the Eklutna, Inc. contribution. The party has also not reported whether the "Election '84" account was used to influence state or federal elections, or possibly used for exempted or party-building activity.

86030504827

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For the Republican Party of the State of Alaska:

Pursuant to its investigation of MUR 2108, the Federal Election Commission requests that you answer the following interrogatories. Please include any additional information or attach documents to your responses as you deem appropriate. Note that the Federal Election Campaign Act of 1971, as amended, defines the following terms:

Contribution

The term "contribution" includes - any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office--2 U.S.C. § 431(8) (A) (i)

Expenditure

The term "expenditure" includes - any purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal Office--2 U.S.C. § 431(9) (A) (i)

1. During 1984, did the Republican Party of the State of Alaska maintain a checking account called "Election '84", and if yes, please state:

- (a) Why this account was established.
- (b) What individuals controlled this account.
- (c) How contributions to this account were solicited.
- (d) Whether this account was used for federal election, state election, or state party purposes.
 - (1) If federal; whether any contributions to federal candidates were made from this account.
 - (2) If federal; whether any expenditures on behalf of federal candidates were made from this account.
 - (3) If federal; whether contributions to, and contributions or expenditures from this account were reported with the Federal Election Commission, and if so, where.
 - (4) If state; for what activities this account was used.

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(5) If state party, for what activities was this account used.

- (e) What other accounts were maintained by the Republican Party of Alaska during the 1984 Election Year.
- (f) For what purposes were each of the accounts listed in your response to (e) used for.
- (g) Whether the "Election '84" account was used in coordination or conjunction with any other accounts of the Republican Party of Alaska, or any federal candidates.

2. On June 14, 1984, Eklutna, Inc. contributed \$5,000 to the "Election '84" account. Regarding that contribution, please state:

- (a) When this contribution was received by "Election '84".
- (b) Who solicited this contribution.
- (c) Whether anyone representing "Election '84" spoke with Daniel Alex regarding the intended use of this contribution.
- (d) Whether Daniel Alex requested this contribution be used in support of any particular candidates, and if so, which candidates.
- (e) Whether this contribution was reported to the Federal Election Commission, and if so, where:
- (f) Whether this contribution was expended on behalf of Reagan-Bush.
- (g) Whether this contribution was expended on behalf of any other federal candidates.

86030604829

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Eklutna, Inc.)

Daniel Alex)

Republican Party of Alaska)

Reagan-Bush '84)

PRE-MUR 148 (M2108)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 3, 1985, do hereby certify that the Commission took the following actions in PRE-MUR 148:

1. Decided by a vote of 4-2 to

a) Open a MUR.

b) Find reason to believe that Eklutna, Inc., and Daniel Alex as President of Eklutna, Inc. in 1984, violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

Commissioners Aikens, Harris, McDonald, and McGarry voted affirmatively for decision; Commissioners Elliott and Josefiak dissented.

2. Decided by a vote of 6-0 to find reason to believe that the Republican Party of Alaska violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

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

(continued)

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Federal Election Commission
Certification for PRE-MUR 148
December 3, 1985

Page 2

3. Decided by a vote of 5-1 to take no action at this time against the Reagan-Bush '84 Committee, but direct the FEC Office of General Counsel to the send interrogatories to the Committee for appropriate response.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Harris dissented.

4. Decided by a vote of 6-0 to

- a) Approve the General Counsel's Factual and Legal Analyses attached to the report dated November 8, 1985, subject to amendment of paragraph one to more accurately reflect the facts; and
- b) Direct the Office of General Counsel to send the appropriate letters pursuant to the Commission's decisions of this date.

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

Attest:

12-5-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86030504831

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D. C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

85 NOV 15 P12:18

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

PRE-MUR #148
DATE CORRESPONDENCE
RECEIVED BY OGC:
August 27, 1985
DATE OF NOTIFICATION
TO THE RESPONDENT:
September 5, 1985
STAFF MEMBER:
C. M. Engle

I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: Eklutna, Inc., Daniel Alex
Republican Party of Alaska,
Reagan-Bush '84

RELEVANT STATUTE: 2 U.S.C. § 441b

INTERNAL REPORTS CHECKED: Commission Records
Advisory Opinion 1982-28

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On August 27, 1985, the Office of General Counsel received a letter from the officers of Eklutna, Inc., an Alaska Native Claims Settlement Act Corporation. The officers' letter expressed concern over an apparent political contribution by Eklutna, Inc., under its previous president, Daniel Alex.

SUMMARY OF ALLEGATIONS

The officers of Eklutna, Inc. have discovered corporate records that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically, the officers are concerned with Eklutna, Inc.'s check no. 7166, a copy of which was forwarded to the General Counsel's Office. (See Attachment I, pages 2 and 3).

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Eklutna's Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is for \$5,000 and made payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. The current officers also forwarded a copy of voided check no. 7165, also for \$5,000.00 and made payable to the "Reagan-Bush Campaign." (See Attachment I, page 4).

Eklutna's officers, concerned that check no. 7166 might be in violation of Federal Election Laws, requested information about the "Election '84" account from the Republican Party of Alaska. On August 14, 1985, the Republican Party delivered a letter to Eklutna, Inc. (See Attachment I, page 5) that acknowledges the receipt of a \$5,000 "donation" from Eklutna, Inc. "on behalf of Reagan-Bush 84, a committee which was dissolved following last year's November election." The Republican Party of Alaska stated that they were not connected with Reagan-Bush 84, and that the "Election '84" account was "one of two operating bank accounts of the Reagan-Bush Committee". Further, the party stated that Eklutna's \$5,000.00 donation was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL AND LEGAL ANALYSIS

Section 441b of the Federal Election Campaign Act prohibits corporations from using their treasury money to make

contributions or expenditures in connection with federal elections. Section 441b also makes it unlawful for any officer or director of a corporation to consent to any prohibited contribution.

Based on the information provided by the officers of Eklutna, Inc., the Office of General Counsel recommends there is reason to believe that Eklutna, Inc. violated 2 U.S.C. § 441b by making a contribution of corporate funds to influence a federal election, and that Daniel Alex, as an officer of the corporation, violated 2 U.S.C. § 441b by consenting to the contribution. 1/

Section 441b of the Federal Election Campaign Act also makes it unlawful for any political committee to knowingly accept or receive a prohibited corporate contribution. The evidence is unclear, however, as to whether Reagan-Bush '84 or the Republican Party of Alaska maintained ownership or control of the Election '84 account.

In its letter to the Officers of to Eklutna, Inc. (Attachment I, page 5) the Republican Party of Alaska states that the Election '84 account was managed by Reagan-Bush '84. The monthly reports of Reagan-Bush '84, however, do not reveal the use or operation of an account called "Election '84". Commission records do disclose that the Republican Party of Alaska reported an "Election '84" account that was generally used for "office expenses" and wages. These reports do not disclose the receipt of a \$5,000 contribution from Eklutna, Inc. or Daniel Alex, but do reveal a June 15, 1984 "pay back" of \$2,466.99 to

1/ Eklutna, Inc., as a corporation chartered by the Alaska Native Claims Settlement Act, is subject to the prohibitions of 2 U.S.C. § 441b. See Advisory Opinion 1982-28.

860330504834

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"Reagan-Bush". In amendments to their reports, the treasurer of the Republican Party of Alaska stated that "thru (her) misunderstanding, the Election '84 Account was reported on previous Quarterly Reports. This account has Corporate Monies and therefore should not have been included." The party did not disclose, however, whether "Election '84" was used to influence state or federal elections, or possibly used for exempted or party-building activity. Finally, the back of the Eklutna, Inc. check shows the endorsement of the Republican Party of Alaska. (Attachment I, page 2).

Therefore, based on records and amendments filed with the Commission by the Republican Party of Alaska and information provided by the Officers of Eklutna, Inc., the Office of General Counsel recommends the Commission find reason to believe the Republican Party of Alaska violated 2 U.S.C. § 441b by knowingly accepting a prohibited corporate contribution. The Office of General Counsel also recommends, based on the letter by the Republican Party of Alaska to Eklutna, Inc., that the Commission find reason to believe Reagan-Bush '84 violated 2 U.S.C. § 441b by knowingly accepting a prohibited corporate contribution.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Eklutna, Inc., violated 2 U.S.C. § 441b of The Federal Election Campaign Act of 1971, as amended.

3. Find reason to believe that Daniel Alex violated 2 U.S.C. § 441b of The Federal Election Campaign Act, as amended.

4. Find reason to believe that the Republican Party of Alaska violated 2 U.S.C. § 441b of the Federal Election Campaign Act of 1971, as amended.

5. Find reason to believe that Reagan-Bush '84 violated 2 U.S.C. § 441b of the Federal Election Campaign Act, as amended.

6. Approve the General Counsel's Factual and Legal Analyses and the attached letters and interrogatories.

Charles N. Steele
General Counsel

November 8, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Material supplied by current officers of Eklutna, Inc.
Proposed letters and interrogatories
General Counsel's Factual and Legal Analyses

86030504836

RECEIVED
BCC-8395

85 AUG 27 9:14



600 W. 7th., SUITE 1800
ANCHORAGE, ALASKA 99501
(907) 276-5701

NC.

August 22, 1985

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Mr. Gross:

Recently we discovered corporate records which indicate that Eklutna, Inc. under a prior administration may have made an improper contribution to a federal candidate. These documents consist of the following:

1. Photocopy of the check request approved by Daniel Alex, who was then President, dated June 14, 1984, for a \$5,000 political contribution for the Reagan/Bush campaign.
2. Photocopy of voided Check No. 7165 made out to the Regan/Bush campaign for \$5,000.
3. Photocopy of Eklutna, Inc.'s file copy of the Check No. 7166 showing the stub description.
4. Photocopy of Check No. 7166 and of the back of the check showing endorsement by the Republican Party of Alaska and deposited in Alaska Continental Bank.

Because of the concern that Check No. 7166 signed by Daniel Alex might be a violation of federal election laws, we requested information from the Republican Party of Alaska. On August 14, 1985, the Republican Party delivered a letter to Eklutna, Inc. concerning this contribution. A photocopy of the letter is enclosed.

As officers of Eklutna, Inc. we do not wish to have the company involved in any illegal activity. We do not know whether or not the \$5,000 contribution was illegal, but believe that the best course of action for the company is to report the facts that we know to the Federal Election Commission.

A. Debbie Fullenwider
A. Debbie Fullenwider
President

Leo Stephan
Leo Stephan
Vice President

Barbara Hitchcock
Barbara Hitchcock
Secretary

Mildred L. Alex
Mildred Alex
Treasurer

ADF/jad

85030604837

Copy of Actual Check & Endorsement



EKLUTNA, INC.
840 K STREET, SUITE 202
ANCHORAGE, AK 99501



Alaska Pacific Bank
OLD CITY HALL OFFICE
ONE THIRDS / 2ND ST. 4TH AVENUE
ANCHORAGE, ALASKA 99501

7166

89-87
1252

June 14, 1984

PAY **PAYED 5,000.00 CTS** DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

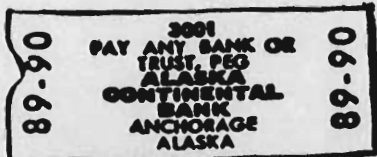
Election 84

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$5,000.00

Samuel Alex

⑈007166⑈ ⑆⑆125200879⑆01 001458 6⑈01

⑈0000500000⑈



⑈0010⑈239 061584 16

100000024548

Repudiated Party
OK
gustice

EKLUTNA INC.
840 K STREET SUITE 202
ANCHORAGE, AK 99501



State of Alaska Bank
BANK OF ALASKA
ANCHORAGE, ALASKA 99501

7166

June 14, 84

89-87
1252

PAYEE 0000000000

5,000.00

Election 84

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$5,000.00

NOT NEGOTIABLE

0125200879001 001458 6001

EKLUTNA, INC.

DELUXE - FORM WVO-S V-2

DATE	DESCRIPTION	AMOUNT
6/14/84	political camprigntion Reagan/Bush campaign	\$5,000.00

8603050483



EKLUTNA, INC.
840 K STREET, SUITE 202
ANCHORAGE, AK 99501



7165

June 14, 1984

PAY

PAYEE \$5,000.00

DOLLARS \$5,000.00

TO
THE
ORDER
OF

Reagan - Bush Campaign

VOID AFTER 60 DAYS

TWO SIGNATURES REQUIRED OVER \$5,000.00

Samuel Alex

⑆007165⑆ ⑆125⑆00879⑆01 001458 ⑆01

DELUXE CHECK PRINTERS

EKLUTNA, INC.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEM(S) DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO REFUND DESIRED.

DELUXE - FORM WDS-3 VS

DATE	DESCRIPTION	AMOUNT
6/14/84	political contribution see ck # 7164	\$5,000.00

I page 4

8 6 0 3 0 5 0 9 8

The Republican Party of Alaska



300 W. 5th Avenue
Anchorage, Alaska 99501
(907) 276-4467

Ken Stout
Chairman
Marylin Paine
National Committeewoman
Elden Ulmer
National Committeeman

Mayor Leo Rasmussen
Vice Chairman (Nome)

Gail Phillips
Secretary (Homer)

Pat Everts
Treasurer (Homer)

Lloyd Hemes
Finance Chair. (Sitka)

Terry Otness
Asst. Sec. (Petersburg)

Mary Elizabeth Lomen
Asst. Treas. (Fairbanks)

August 14, 1985

Eklunta, Inc.
550 W. 7th Avenue, Suite 1550
Anchorage, AK 99501

RE: Disposition of Contribution to Reagan-Bush 84

Dear Madame President:

The Republican Party of Alaska on behalf of Reagan-Bush 84, a committee which was dissolved following last year's November election, wishes to acknowledge the receipt of a \$5,000 donation last summer from Eklutna, Inc. This donation was processed through an account at Alaska Continental Bank called "Election 84" which was one of two operating bank accounts of the Reagan-Bush Committee.

The Republican Party of Alaska wishes to stress the fact that while our investigation of the Reagan-Bush records indicated that your contribution was received and used for campaign purposes we are not officially in any capacity connected with Reagan-Bush 84. Our investigation of the donation was done as a courtesy to your organization.

To the best of our knowledge, the monies were expended for the political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities.

Our investigation revealed that proper reporting to the Federal Election Commission had been followed regarding the Eklutna donation.

Please feel free to contact us if we can be of any further assistance.

Sincerely,

DAVID J. WOODSON
Executive Director

/laj

I page 5

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CHECK REQUEST

Eklutna, Inc.

Eklutna, Utilities

PAY TO: Reagan / Bush Campa

Description:

political contribution

Comments:

ACCOUNT	AMOUNT
527	5,000.00

TOTAL \$ 5,000.00

PREPARED BY:

KL

APPROVED BY:

SA

DATE:

6/14/84



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Leo Stephan, President
Eklutna, Inc.
550 W. 7th, Suite 1550
Anchorage, Alaska 99501

RE: MUR
Eklutna, Inc.
Leo Stephan, President

Dear Mr. Stephan:

On , 1985, the Federal Election Commission determined that there is reason to believe Eklutna, Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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 Eklutna, Inc. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against Eklutna, Inc., 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 is 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.

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.

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 Craig M. Engle, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Associate General Counsel

Enclosures

General Counsel's Factual and Legal Analysis
Interrogatories
Commission Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For Eklutna, Inc.:

Pursuant to its investigation of MUR _____, the Federal Election Commission requests, that Eklutna, Inc. answer the following interrogatories. Please include any additional information or attach documents to your responses as you deem appropriate. Note that the Federal Election Campaign Act of 1971, as amended, defines the following term:

Contribution

Shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value...to any candidate, campaign committee or political party or organization, in connection with any election to (federal office)---2 U.S.C. § 441b(b)(2)

1. On June 14, 1984, Eklutna, Inc. issued, and later voided, check no. 7165. Regarding that check, please state:
 - (a) On who's request or knowledge the check was issued.
 - (b) For what reason or purpose the check was issued.
 - (c) On who's request or knowledge the check was voided.
 - (d) For what reason or purpose the check was voided.
2. On June 14, 1984, Eklutna, Inc. issued check no. 7166 for \$5,000.00 to "Election '84". Regarding that check, please state:
 - (a) On who's request or knowledge the check was issued.
 - (b) For what reason or purpose the check was issued.
 - (c) From what account the check was issued.
 - (d) What monies are normally deposited in the account from which the check was issued.
 - (e) Whether anyone from the Republican Party of Alaska solicited this check from Eklutna, Inc..
 - (f) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding their intended use of this contribution.

- (h) Whether Daniel Alex requested this contribution be used in support of any particular candidates, and if so, which candidates.
- (i) Whether this contribution was reported to the Federal Election Commission, and if so, where.
- (j) Whether this contribution was expended on behalf of Reagan-Bush, or any other federal candidates.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Daniel Alex
c/o Eklutna, Inc.
550 W. 7th, Suite 1550
Anchorage, Alaska 99501

RE: MUR
Daniel Alex

Dear Mr. Alex:

On , 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, 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 is 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.

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 Craig M. Engle, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Associate General Counsel

Enclosures

General Counsel's Factual and Legal Analysis
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Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For Daniel Alex:

Pursuant to its investigation of MUR _____, the Federal Election Commission requests you answer the following interrogatories. Please include any additional information or attach documents to your responses as you deem appropriate. Note that the Federal Election Campaign Act of 1971, as amended, defines the following term:

Contribution

Shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value...to any candidate, campaign committee or political party or organization, in connection with any election to (federal office)---2 U.S.C. § 441b(b)(2)

1. On June 14, 1984, you signed Eklutna, Inc. check no. 7165. Regarding that check please state:
 - (a) On who's request or knowledge the check was issued:
 - (b) For what reason or purpose the check was issued:
 - (c) On who's request or knowledge the check was voided:
 - (d) For what reason or purpose the check was voided:
2. On June 14, 1984, you signed Eklutna, Inc. check No. 7166, made for \$5,000 to "Election '84". Regarding that check, please state:
 - (a) On who's request or knowledge the check was issued.
 - (b) For what reason or purpose the check was issued.
 - (c) From what account the check was issued.
 - (d) Whether anyone from the Republican Party of Alaska solicited this check from Eklutna, Inc.
 - (e) Whether anyone representing "Election '84" spoke with you at the time this contribution was made, regarding their intended use of this contribution.
 - (f) Whether you requested this contribution be used in support of any particular candidates, and if so, which candidates.

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- (g) Whether this contribution was reported to the Federal Election Commission, and if so, where.
- (h) Whether this contribution was expended on behalf of Reagan-Bush or any other federal candidates.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David J. Woodson, Executive Director
The Republican Party of Alaska
300 W. 5th Avenue
Anchorage, Alaska 99501

RE: MUR
Republican Party of Alaska
David Woodson, Executive
Director

Dear Mr. Woodson:

On , 1985, the Federal Election Commission determined that there is reason to believe the Republican Party of Alaska violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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 The Republican Party of Alaska. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against The Republican Party of Alaska, 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 is 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.

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 Craig M. Engle, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Associate General Counsel

Enclosures

General Counsel's Factual and Legal Analysis
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FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For the Republican Party of the State of Alaska, David Woodson as Executive Director:

Pursuant to its investigation of MUR _____, the Federal Election Commission requests that you answer the following interrogatories. Please include any additional information or attach documents to your responses as you deem appropriate. Note that the Federal Election Campaign Act of 1971, as amended, defines the following terms:

Contribution

The term "contribution" includes - any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal Office--2 U.S.C. § 431(8)(A)(i)

Expenditure

The term "expenditure" includes - any purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal Office--2 U.S.C. § 431(9)(A)(i)

1. During 1984, did the Republican Party of the State of Alaska maintain a checking account called "Election '84", and if yes, please state:

- (a) Why this account was established.
- (b) What individuals controlled this account.
- (c) How contributions to this account were solicited.
- (d) Whether this account was used for federal election, state election, or state party purposes.
 - (1) If federal; whether any contributions to federal candidates were made from this account.
 - (2) If federal; whether any expenditures on behalf of federal candidates were made from this account.
 - (3) If federal; whether contributions to, and contributions or expenditures from this account were reported with the Federal Election Commission, and if so, where.
 - (4) If state; for what activities this account was used.

- (5) If state-party, for what activities was this account used.
- (e) What other accounts were maintained by the Republican Party of Alaska during the 1984 Election Year.
- (f) For what purposes were each of the accounts listed in your response to (e) used for.
- (g) Whether the "Election '84" account was used in coordination or conjunction with any other accounts of the Republican Party of Alaska, or any federal candidates.
2. On June 14, 1984, Eklutna, Inc. contributed \$5,000.00 to the "Election '84" account. Regarding that contribution, please state:
- (a) When this contribution was received by "Election '84".
- (b) Who solicited this contribution.
- (c) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding the intended use of this contribution.
- (d) Whether Daniel Alex requested this contribution be used in support of any particular candidates, and if so, which candidates.
- (e) Whether this contribution was reported to the Federal Election Commission, and if so, where:
- (f) Whether this contribution was expended on behalf of Reagan-Bush.
- (g) Whether this contribution was expended on behalf of any other federal candidates.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Scott Mackenzie
Reagan-Bush '84
1019 19th Street, N.W. Suite 1000
Washington, D.C. 20036

RE: MUR
Reagan-Bush '84
Scott Mackenzie,
Assistant Treasurer

Dear Mr. Mackenzie:

On , 1985, the Federal Election Commission determined that there is reason to believe Reagan-Bush '84 violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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 Reagan-Bush '84. 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 interrogatories, within fifteen days of your receipt of this letter. All statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against Reagan-Bush '84, 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 is 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.

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 Craig M. Engle, the attorney assigned to this matter at (202) 523-4000.

Sincerely,

Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For Reagan-Bush '84, Scott Mackenzie as Assistant Treasurer:

Pursuant to its investigation of MUR _____, the Federal Election Commission requests that you answer the following interrogatories. You may include any additional information or attach documents to your responses as you deem appropriate.

1. During 1984, did Reagan-Bush '84 maintain a checking account called "Election '84", and if yes, please state:
 - (a) Why this account was established.
 - (b) What individuals controlled this account.
 - (c) How contributions to this account were solicited.
 - (d) For what activities or purposes was this account used.
 - (e) Whether the "Election '84" account was used in coordination or conjunction with any accounts of the Republican Party of Alaska, or any federal candidates.
2. On June 14, 1984, Eklutna, Inc. contributed \$5,000.00 to the "Election '84" account. Regarding that contribution, please state:
 - (a) When this contribution was received by "Election '84".
 - (b) Who solicited this contribution.
 - (c) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding the intended use of this contribution.

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT Eklutna, Inc., Leo Stephan as President

SUMMARY OF ALLEGATIONS

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In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has discovered past corporate records that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc.'s check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000.00 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000.00 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

Section 441b of the Federal Election Campaign Act prohibits corporations from using their treasury money to make

contributions or expenditures in connection with federal elections.

Based on the information provided by the officers of Eklutna, Inc., the Office of General Counsel recommends there is reason to believe that Eklutna, Inc., violated 2 U.S.C. § 441b by making a contribution of corporate funds to influence a federal election. 1/ Specifically, Eklutna, Inc. check no. 7166 is made payable to "Election '84", which appears to be an account from which money was expended to influence federal elections, namely, on behalf of President Reagan.

1/ Eklutna, Inc., as a corporation chartered by the Alaska Native Claims Settlement Act, is subject to the prohibitions of 2 U.S.C. § 441b. See Advisory Opinion 1982-28.

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT Daniel Alex

SUMMARY OF ALLEGATIONS

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In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has discovered past corporate records that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc.'s check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by you, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000.00 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000.00 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

Section 441b of the Federal Election Campaign Act prohibits corporations from using their treasury money to make

contributions or expenditures in connection with federal elections. Section 441b also makes it unlawful for any officer or director of a corporation to consent to any prohibited contribution.

Based on the information provided by the officers of Eklutna, Inc., the Office of General Counsel recommends there is reason to believe that Daniel Alex, as an officer of Eklutna, Inc., violated 2 U.S.C. § 441b by consenting to the contribution of corporate money to influence a federal election.

Specifically, Eklutna, Inc. check no. 7166, which is signed by Daniel Alex and made payable to "Election '84", appears to have been used to influence federal elections, namely, on behalf of President Reagan.

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT Republican Party of Alaska;
David Woodson, Executive Director

SUMMARY OF ALLEGATIONS

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has discovered past corporate records that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc.'s check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000.00 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000.00 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

The Office of General Counsel recommends there is reason to believe that the Republican Party of Alaska violated 2 U.S.C. § 441b by knowingly accepting the Eklutna, Inc. contribution.

Section § 441b makes it unlawful for any political committee to knowingly accept or receive a prohibited corporate contribution. Based on the information provided by the Officers of Eklutna, Inc., the Republican Party of Alaska received and endorsed the corporate contribution. Further, the Party's reports filed with the Commission indicate that it maintained an account called "Election '84", but do not disclose the Iklutna, Inc. contribution. The party has also not reported whether the "Election '84" account was used to influence state or federal elections, or possibly used for exempted or party-building activity.

8 6 0 3 0 5 0 4 8 6 3

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT Reagan-Bush '84
Scott Mackenzie, Assistant Treasurer

SUMMARY OF ALLEGATIONS

8 5 0 3 0 5 0 4 8 6 4

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has discovered past corporate records of Eklutna, Inc. that may indicate a contribution of corporate treasury funds to a federal political party committee or presidential committee. Specifically at issue is Eklutna, Inc.'s check no. 7166, a copy of which was forwarded to the General Counsel's Office. Check No. 7166, dated June 14, 1984 and signed by Daniel Alex, is made for \$5,000 and payable to "Election '84." The corporation's check stub describes this check as a political contribution to the Reagan-Bush campaign, and the check bears the endorsement of the Republican Party of Alaska. Also forwarded to the Office of General Counsel was a copy of voided Eklutna, Inc. check no. 7165, made for \$5,000.00 and payable to the "Reagan-Bush Campaign." The Republican Party of Alaska, in a letter to Eklutna, Inc., describes the "Election '84" account as "one of two operating bank accounts of the Reagan-Bush Committee." Further, the party states that Eklutna's \$5,000.00 contribution was "expended for political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities."

FACTUAL BASIS AND LEGAL ANALYSIS

The Office of General Counsel recommends there is reason to believe that Reagan-Bush '84 violated 2 U.S.C. § 441b by knowingly accepting the Eklutna, Inc. contribution.

Section § 441b makes it unlawful for any political committee to knowingly accept or receive a prohibited corporate contribution. Based on the information provided by the Officers of Eklutna, Inc., and the Republican Party of Alaska, the Reagan-Bush Committee has accepted and used a prohibited corporate contribution. The Eklutna, Inc., check for \$5,000 was deposited in an account called "Election '84", which was one of the two operating bank accounts of the "Reagan Bush Committee". The Eklutna, Inc., contribution was then expended to influence a federal election, namely, on behalf of President Reagan.

36030504855



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 5, 1985

A. Debbie Fullenwider, President
Mildred Alex, Treasurer
Eklutna, Inc.
550 W. 7th., Ste. 1550
Anchorage, Alaska 99501

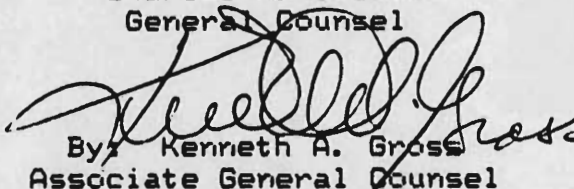
Dear Ms. Fullenwider:

This letter will acknowledge receipt of your complaint which we received on August 27, 1985, which alleges possible violations of the Federal Election Campaign laws by the Republican Party of Alaska. A staff member has been assigned to analyze your allegations.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. We have numbered this matter under review Pre-MUR 148. Please refer to this number in all future correspondence. If you have any questions, please contact Stuart C. Mc Hardy at (202)523-4075.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure

186030504856



RECEIVED AT THE FEC

GCCH#8625
85 SEP 25 P12:05

September 19, 1985

CERTIFIED #P 175 940 46
RETURN RECEIPT REQUESTED

SEP 25
P12:45

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street
Washing, D.C. 20463

Dear Mr. Gross:

Thank you for your letter of September 5, 1985. We assume your letter was a form letter, since it refers to a complaint. Our letter of August 22, 1985, was not a complaint. It was merely a letter of disclosure to protect Eklutna, Inc.

Sincerely,

Leo Stephan
Leo Stephan
President

A. Debbie Fullenwider
A. Debbie Fullenwider
Vice President

Barbara Hitchcock
Barbara Hitchcock
Secretary

Mildred Alex
Mildred Alex
Treasurer

LS:kd



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 31, 1985

Scott Mackenzie
Reagan-Bush '84
1019 19th Street, N.W. Suite 1000
Washington, D.C. 20036

RE: MUR 2108

Dear Mr. Mackenzie:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In order to assist in an investigation currently being conducted, the Commission requests that you supply certain information in response to the attached questions.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses. The Commission requests, however, that you submit the information within fifteen days of your receipt of this letter.

If you have any questions, please direct them to Patricia M. Reilly, the attorney handling this matter, at 376-8200.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross (signature)

By: Kenneth A. Gross
Associate General Counsel

Enclosures
Interrogatories
Designation of counsel letter

86030504888

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

INTERROGATORIES

For Reagan-Bush '84, Scott Mackenzie as Assistant Treasurer:

Pursuant to its investigation of MUR 2108, the Federal Election Commission requests that you answer the following interrogatories. You may include any additional information or attach documents to your responses as you deem appropriate.

1. During 1984, did Reagan-Bush '84 maintain a checking account called "Election '84", and if yes, please state:
 - (a) Why this account was established.
 - (b) What individuals controlled this account.
 - (c) How contributions to this account were solicited.
 - (d) For what activities or purposes was this account used.
 - (e) Whether the "Election '84" account was used in coordination or conjunction with any accounts of the Republican Party of Alaska, or any federal candidates.
2. On June 14, 1984, Eklutna, Inc. contributed \$5,000 to the "Election '84" account. Regarding that contribution, please state:
 - (a) When this contribution was received by "Election '84".
 - (b) Who solicited this contribution.
 - (c) Whether anyone representing "Election '84" spoke with Daniel Alex at the time this contribution was made, regarding the intended use of this contribution.

86030504869

**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

86030604872



eklutna
550 W. 7th., SUITE 1550
ANCHORAGE, ALASKA 99501
(907) 278-5701

August 22, 1985

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Mr. Gross:

Recently we discovered corporate records which indicate that Eklutna, Inc. under a prior administration may have made an improper contribution to a federal candidate. These documents consist of the following:

1. Photocopy of the check request approved by Daniel Alex, who was then President, dated June 14, 1984, for a \$5,000 political contribution for the Reagan/Bush campaign.
2. Photocopy of voided Check No. 7165 made out to the Regan/Bush campaign for \$5,000.
3. Photocopy of Eklutna, Inc.'s file copy of the Check No. 7166 showing the stub description.
4. Photocopy of Check No. 7166 and of the back of the check showing endorsement by the Republican Party of Alaska and deposited in Alaska Continental Bank.

Because of the concern that Check No. 7166 signed by Daniel Alex might be a violation of federal election laws, we requested information from the Republican Party of Alaska. On August 14, 1985, the Republican Party delivered a letter to Eklutna, Inc. concerning this contribution. A photocopy of the letter is enclosed.

As officers of Eklutna, Inc. we do not wish to have the company involved in any illegal activity. We do not know whether or not the \$5,000 contribution was illegal, but believe that the best course of action for the company is to report the facts that we know to the Federal Election Commission.

A. Debbie Fullenwider
A. Debbie Fullenwider
President

Leo Stephan
Leo Stephan
Vice President

Barbara Hitchcock
Barbara Hitchcock
Secretary

Mildred L. Alex
Mildred Alex
Treasurer

ADF/jad

1374



eklutna
INC.

550 W 7th Ave. Bldg., Suite 1550
Anchorage, Alaska 99501

CERTIFIED

P 175 940 467

MAIL



Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463

05 SEP 25 PM 09

The Republican Party of Alaska



300 W. 5th Avenue
Anchorage, Alaska 99501
(907) 276-4467

Ken Stout
Chairman
Marylin Paine
National Committeewoman
Elden Ulmer
National Committeemen

Mayor Leo Reamussen
Vice Chairman (Nome)

Gail Phillips
Secretary (Homer)

Pat Everts
Treasurer (Homer)

Lloyd Harnes
Finance Chair. (Sitka)

Terry Otness
Asst. Sec. (Petersburg)

Mary Elizabeth Lomen
Asst. Treas. (Fairbanks)

August 14, 1985

Eklunta, Inc.
550 W. 7th Avenue, Suite 1550
Anchorage, AK 99501

RE: Disposition of Contribution to Reagan-Bush 84

Dear Madame President:

The Republican Party of Alaska on behalf of Reagan-Bush 84, a committee which was dissolved following last year's November election, wishes to acknowledge the receipt of a \$5,000 donation last summer from Eklutna, Inc. This donation was processed through an account at Alaska Continental Bank called "Election 84" which was one of two operating bank accounts of the Reagan-Bush Committee.

The Republican Party of Alaska wishes to stress the fact that while our investigation of the Reagan-Bush records indicated that your contribution was received and used for campaign purposes we are not officially in any capacity connected with Reagan-Bush 84. Our investigation of the donation was done as a courtesy to your organization.

To the best of our knowledge, the monies were expended for the political purposes involved in re-electing the President. This contribution would have been used for such items as mailings and telephone activities.

Our investigation revealed that proper reporting to the Federal Election Commission had been followed regarding the Eklutna donation.

Please feel free to contact us if we can be of any further assistance.

Sincerely,

DAVID J. WOODSON
Executive Director

86030604875



EKLUTNA, INC.
440 K STREET, SUITE 202
ANCHORAGE, AK 99501



Academy of Podiatric Medicine
610 CITY HALL DRIVE
BOX 10000 / JEFFERSON, MI 48150
PHON: 313-688-1000

June 14, 1984

69-67
1252

219

Pay

PAKISTAN

~~DOLLARS \$5,000.00~~

THE
ORDER
OF

Reagan - Bush Campaign

VOID AFTER 90 DAYS -
TWO SIGNATURES REQUIRED OVER \$5,000.00

00071654 01:1251008791:01 001158 670%

EKLUTNA, INC.

DATE _____

DECLARATION

Л.Н. КОЗЛОВ

6/14/84

political contribution

sex or 7164

\$5,000.00

86030504876

Copy of Actual Check & Endorsement



EKLUTNA, INC.
840 K STREET, SUITE 202
ANCHORAGE, AK 99501



Alaska Pacific Bank
OLD CITY HALL OFFICE
BOX 10000 / 5TH ST. AVENUE
ANCHORAGE, ALASKA 99510

7166

89-87
1252

June 14, 1984

PAY

PAYEE 5000000000

DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

Election 84

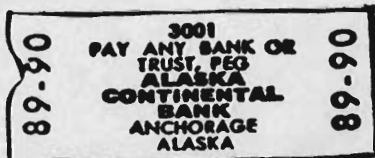
VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$5,000.00

Samuel Alex

⑈007166⑈ ⑆125200879⑆01 001458 6⑈01

⑈0000500000⑈

BEFORE CHECK PRINTED



100100239 061584 16

100000024546

*89-87
1252
6/15/84
OK
Republic Bank
Deposit to the Account of
Election 84*



7166

June 14, 84

89-87
1252

DATE 20070225

5,000.00

Election 84

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED OVER \$5,000.00

NOT NEGOTIABLE

12 25 2008 79:01 00 14 58 6r01

EKLUTNA, INC.

DELUXE - FORM WVO-8 V-2

DATE	DESCRIPTION	AMOUNT
6/14/84	political contribution Reagan/Bush campaign	\$5,000.00

CHECK REQUEST

Eklutna, Inc.

Eklutna, Utilities

☒
☐
☐

PAY TO:

Rengas / Bush Company

Description:

political contribution

Comments:

ACCOUNT	AMOUNT
527	5,000.00

TOTAL \$ 5,000.00

PREPARED BY:

KL

APPROVED BY:

SA

DATE:

8/14/84

86030504879



550 W 7th Ave. Bldg., Suite 1550
Anchorage, Alaska 99501

**RETURN RECEIPT
REQUESTED**

CERTIFIED

P 140 434 803

MAIL

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street
Washington, D.C. 20463



85 AUG 27

4:14

86030504881



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2108

Date Filmed 8/1/86 Camera No. --- 3

Cameraman AS