RECEIVED AT THE FEC
GCC#1928
86 NOV 5 P1:24

MUR 2288

M. Kay Christensen
Manager
Wayne Owens for Congress Committee
275 East South Temple
Suite 300
Salt Lake City, Utah 84111

November 3, 1986

86 NOV 5 P12:00
RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

The undersigned manager of the Wayne Owens for Congress Committee submits the following complaint pursuant to 11 CFR 111.4 against the Shimizu For Congress Committee, the Republican National Committee and the Utah State Republican Committee.

M. Kay Christensen, being first duly sworn, states as follows:

1. I have reason to believe that the Shimizu for Congress Committee, the Republican National Committee and the Utah State Republican Party have violated provisions of federal law which restrict the amount of money which can be spent by the state and national committees of a political party on behalf of a candidate for the United States House of Representatives, in particular, the provisions of 11 CFR 110.7.

2. Recognizing that the state and national parties may contribute $10,000.00 each in cash to the Shimizu campaign committee, and that they may spend $21,810.00 each (based on cost of living increases in party coordinated expenditures limit as published in the FEC Record, Volume 12, Number 4, April, 1986) for a total of $63,620.00 in contributions and coordinated expenditures, I believe this limit has been exceeded by a variety of mailings and newspaper inserts which have been distributed in the closing days of the campaign. FEC reports relating to some of these last minute expenditures will not be available to us until after the election, requiring me to rely on estimates in calculating the cost of some expenditures.

3. I have reason to believe the following contributions and expenditures have been made, the first five of which are

documented by the attached newspaper reports:

(a)	Pre-primary Anti-Owens radio spot, paid for by State Party (7/13/86)	$ 5,000.00
(b)	RCCC Donation (9/16/86)	10,000.00
(c)	"Village Voice" radio spot, paid for by State Party (10/6/86)	5,000.00
(d)	"This is the Door" mailing, mailed by State Party (10/29/86)	8,000.00
(e)	"You Can Tell" mailing, mailed by State Party (10/29/86)	15,000.00
(f)	Letter to Voters from Gov. Bangerter (11/1/86), mailed by State Party	8,000.00 (estimated)
(g)	Letter from President Reagan mailed by State Party (11/1/86)	8,000.00
(h)	Newspaper inserts of both letters (11/3/86) described in (f) and (g) above.	3,948.00 (estimated)
(i)	Costs associated with fund-raising appearance by former President Ford	10,000.00
	TOTAL:	$ 72,948.00

I request that this complaint be processed in accordance with the provisions of 11 CFR 111.5.

M. Kay Christensen

M. Kay Christensen

STATE OF UTAH)
: ss
COUNTY OF SALT LAKE)

M. Kay Christensen, being first duly sworn upon oath, deposes and says that she is the affiant named in the foregoing Affidavit, that she has read the foregoing Affidavit, knows and understands the contents thereof; that the facts therein stated are true.

M. Kay Christensen

M. Kay Christensen

SUBSCRIBED AND SWORN to before me this 3 day of November, 1986.

Diane Berrien
Notary Public
Residing at: SLC, Ut

My Commission Expires:

1-18-87

00407626

2004078603

Feud Blurs End Of Quiet Summer Days in Utah Politics

By Dan Bates
Tribune Staff Writer

So much for the quiet summer days in Utah politics.

The Utah Republican Party is airing a $5,000 radio-ad campaign to counter Wayne Owens's $40,000 television spots designed to counter GOP charges that he's really a "big liberal spender."

Republican leaders claim the Democrats' two 2nd Congressional District contestants — Toni Shimizu and Douglas Bischoff — must concentrate on their Aug. 19 primary rivalry and cannot afford an Owens attack at the moment.

And now, the Utah Libertarian Party's chairman is complaining about unfair treatment by the Utah State Fair hierarchy.

The chairman even says he smells an ongoing Democratic conspiracy here to quell some of his party's thunder, which he claims is on the rise.

Libertarians planned a 10-hour rock concert in the fairgrounds outdoor arena on Pioneer Day as a fund-raising and voter-registration inducement.

But the state fair director nixed the event, citing sentiments from Salt Lake City Hall and Rose Park neighbors that noise from such activities has become unbearable.

The Libertarians refused an offer to hold the concert inside the "non-air conditioned" Fairgrounds Coliseum on July 24.

The Republicans' radio bit tries to be as playful as the Owens TV spots it attempts to defuse. It's sort of a defusal of a defusal through paid media.

It begins: "A little Democrat strategy ..." It continues with the voices of two men.

Now it's got to be a slogan people will believe."

"OK, how about this: 'Wayne Owens stands up to liberals in Washington.'"

Naw, that didn't work last time.

The GOP spot refers to the former Democratic congressman's association with Ted Kennedy and Tip O'Neill in the past.

Then the two "strategists" come up with "Wayne Owens, fiscal conservative" — followed by hysterical laughter.

Finally, the spot concludes: "Wayne, you've got some explaining to do."

Kay Christensen, Mr. Owens's campaign manager, said: "The reason we ran our commercial is because of this kind of negative campaigning and name calling.

"The Republicans should look at the figures [of the Owens voting record] instead of just resorting to calling names," she said. "I think the voters of the 2nd District are intelligent people and won't pay any attention to it."

The Owens campaign began its TV ads about two weeks ago. It features Mr. Owens's real-life neighbor lady who is also a professional actress, scolding his "opponents" for portraying him as a "big liberal spender."

The Owens spot stresses that, as a congressman in 1973-74, he supported measures to reduce deficits and cut spending.

In a news release accompanying a tape copy of the Republican ad, Larry Lunt, Utah GOP chairman, said: "Democrats are very concerned about Wayne Owens's record; they would like to rewrite history."

"That's why they are spending so much time and money this early to try and inoculate the public and convince them that he is consistent with Utah mainstream thinking. We're just not going to let them get away with."

Although the GOP spot never refers to specifics, Mr. Owens has raised about his budget voting-record. Mr. Lunt's statement says the Democrat "opposed capital punishment and voted for massive cuts in the defense budget. Again, we hear him speaking of defense cuts that could cost Utah jobs."

Gregg McDonough, the Utah Republican Party's executive director, said the $5,000, 10-day anti-Owens radio crusade is meant as early intervention aid for either the Shimizu-Bischoff bids, both trailing the Democrat so far in 2nd District polls.

"I guess the real reason is we have

See B-3, Column 1

The Salt Lake Tribune **Local** Sunday Morning—July 13, 1986
Section B Page 1

Continued from B-1

two candidates vying for the congressional seat, and neither is in the position financially [to respond]. They can't take on Owens until after the primary," he said.

"We feel he's pointing out the problem he has, being a big spender. His ad really doesn't inoculate it. He's fingering the problem," said Mr. McDonough.

"It's fun," he conceded. "But we couldn't afford to drop $50,000 in a TV campaign."

Libertarian party chairman Robert Waldrop contends the group's "Live Free or Die — Freedom Rock '86" affair was arbitrarily unplugged.

Mr. Waldrop said state fair director Art Jones cited "heavy pressure" from Salt Lake City Mayor Palmer DePaulis's office to "cancel all outdoor rock concerts."

But, in a news release, the Libertarian leader said discussions with a DePaulis aide indicated City Hall was only concerned about concert noise going late on weeknights.

Mr. Waldrop said his party has encountered "harassment" from Democrats in the recent past, supposedly because Libertarians of late have been stealing votes from Democrats.

He noted that Democrats called police a few weeks ago when Libertarians picketed that party's state convention. He also said Libertarians had "discovered" that Mr. Jones is a Democrat.

"The surprising thing, I guess, is that the harassment is coming not from the party in power, the Republicans, but rather from the Democrats," Mr. Waldrop said in his release.

Mr. Jones — who now happens to work for a GOP state administration — dismissed the Libertarian's insinuations.

"What they're trying to do is use this as a political connection, which is absolute nonsense," the fair director said.

When some Rose Park residents lodged complaints after other outdoor concerts were staged at the fairgrounds this spring, officials decided to change their policy, Mr. Jones explained.

"We felt like, to be good neighbors, we'd cease that kind of stuff," he said.

"The mayor's office has called us on several occasions about the noise impact on the neighborhoods. The police and the [Rose Park] Community Council have called as well," Mr. Jones said.

A July 4 outdoor concert was permitted at the fairgrounds because the promoters had a binding contract with state officials. Although the Libertarian Party had signed a like agreement, Mr. Jones said he never signed the contract for the July 24 event and, thus, had every right to cancel it.

Meanwhile, Mr. Waldrop said a lawsuit against the Utah State Fair was the "least likely" option the Libertarians would pursue.

00040726



—Tribune Staff Photo by Don Miller

Rep. Guy Vander Jagt, R-Mich., a leading GOP partisan, arrived in Salt Lake City Friday to boost the campaign of Tom Shimizu at a fund-raising luncheon. Mr. Shimizu is running against Democrat Wayne Owens in the state's 2nd Congressional District.

GOP Leader Calls Owens-Shimizu Race 'Crucial'

By Douglas L. Parker
Tribune Political Editor

The national Republican congressional campaign leader, arriving Friday in Salt Lake City with contribution checks in hand for Tom Shimizu, described Utah's 2nd District race as "the most crucial battlefield of them all" to preserve President Reagan's support.

Rep. Guy Vander Jagt, 20-year congressman from Michigan and one of the leading GOP partisans in the House, described this year's election nationally, and those in 1988, as "elections of destiny" in determining the outcome of what he called the Reagan revolution.

Should the Republican commitment waver, "Ronald Reagan won't just be a lame duck; he'll be a dead duck," said the chairman of the National Republican Congressional Committee.

He spoke at a $25-a-plate Westin Hotel Utah luncheon, attended by nearly 250 people, to embrace with effusive praise the campaign of Salt Lake County Commissioner Shimizu against former Democratic congressman Wayne Owens.

Rep. Vander Jagt ceremoniously presented the commissioner with checks totaling $10,000 from the national committee, and he promised more help in other authorized coordinated campaign expenditures, for a

government and a strong defense, and mark the return to "big spending policies of the past," Rep. Vander Jagt maintained.

The congressman has spearheaded a drive to repeal the 22nd amendment to allow President Reagan to run for a third term in 1988, a cause he labeled as "letting the people instead of the politicians decide who should lead this country."

Critics initially dismissed the proposal as a sham and gimmick to raise funds for Republican campaigns. But Rep. Vander Jagt said the movement "has a life of its own," and that funds raised are plowed back into the amendment drive. There is more chance of passage than he initially thought, he asserted. There is time enough for Congress to pass the amendment and circulate it to the state legislatures, but the chief question is whether the political will is there on the part of the Democrats, he said.

Commissioner Shimizu pledged his support [illegible] committee fashioning the tax reform bill, acknowledged a "lessening in ardor" by some colleagues to-

See B- Column 1

Owens' conservative claim draws Utah GOP ad barrag



The Utah Republican Party will run a series of radio advertisements challenging the claim of Democrat Wayne Owens that he is a fiscal conservative.

The ads highlight a Sept. 23 article in the Village Voice, a New York City newspaper, which identifies Owens' 2nd Congressional District race as one of 16 political contests in the nation where liberals should spend their money.

"When I tell people that Wayne Owens is the liberals' choice, they tend to discount it as partisan bias," said state Republican Chairman Larry Lunt in a press conference Monday at GOP headquarters. "But when a paper like the Village Voice calls Owens an important investment for liberals, I think Utahns need to know about it."

He said Owens has made it clear that one of his main concerns is his vulnerability in being identified as a big spender. "He has spent more money on television commercials trying to convince Utahns that he is a fiscal conservative than Tom Shimizu (the Republican candidate) has spent on his entire campaign," Lunt said.

Owens' campaign manager Kay Christensen said the GOP's attack was expected. "It's a smoke screen. It's labeling and name calling," she said. "You don't see Shimizu paying for these ads, do you? That's because it's negative campaigning and the state party thinks it can take the heat for it, not Shimizu."

In answering questions by the press, Lunt said the state party is paying for the ads, which will cost between $5,000 and $6,000 "because we had the money, and this is a legitimate way to spend it." He said he's prepared to take out similar ads against Democratic candidates in the 1st and 3rd Congressional Districts — Gunn McKay and Dale Gardiner, respectively — should it become necessary.

Asked if the GOP advertisements are just attempts at labeling, Lunt said Owens' recent radio advertisement, in which Shimizu's county commission voting record is criticized, suggests that Owens is a conservative and Shimizu a liberal. "That's just simply not the case. It's misleading and an attempt to sell a bill of goods to the voters."

Lunt said that in his two years in Congress Owens "voted against business and for big labor, time and again.

"There is no doubt in my mind that Tom Shimizu is much more in tune with the values and beliefs of the vast majority of the 2nd Congressional District than is Wayne Owens," Lunt said.

He added that "Eastern PACs and left-wing activists have responded to articles like the Village Voice piece by sending tens of thousands of dollars to Owens' campaign. They see him as a good investment because they are convinced that Wayne Owens will give them a good return for their money. I think they know what they are doing."

The Village Voice article notes that Owens was Rocky Mountain coordinator for Robert Kennedy's presidential campaign in 1968 and was administrative assistant to Sen. Edward Kennedy, D-Mass.

The article says that after losing races for senator and governor, Owens has "tried to make himself a more acceptable candidate in Utah."

The Republican Party also re ved information about Owens' votin ec- ord when he was in Congress, ert- ing that Owens voted the sa as "self-proclaimed radical femin sel- la Abzug," a New York repre nta- tive, much of the time.

Christensen said such voting ord comparisons are foolish. "Sinc ost of the bills in Congress pass, a jor- ity of representatives agree ore than 50 percent of the time. ens often voted with former Rep. val Hansen, a conservative Mormo le- publican from Idaho."

Lunt scoffed at that claim, p nt- ing figures that show Owens ted with Hansen 63.9 percent of th me, but with House Speaker Tip eill 82.7 percent of the time and w Ab- zug 84 percent of the time.

Lunt said the state party w pay for more advertisements enlig ng the voters about Owens' "true re" as events dictate.

Owens spot, Shimizu mailers trigger latest round in battle

By Bob Bernick Jr.
Deseret News political editor

New charges of unfair, dirty political advertising flew between 2nd Congressional District candidates Tom Shimizu and Wayne Owens on Wednesday — the latest round involving an Owens' TV spot and four mailers sent out on Shimizu's behalf.

Shimizu, a Salt Lake County commissioner, called a morning news conference to condemn a new Owens television commercial, which is running this week through Thursday. Viewers of Monday night's World Series championship saw Owens criticize Shimizu for "raising county property taxes by 64 percent and his own salary by 53 percent." The ad goes on to say that in his two years in Congress, Owens didn't vote for a tax or salary increase.

Shimizu said Owens "knows the truth, but for political reasons, he is willing to misrepresent my record. He is playing attack ads that are not only negative but extremely misleading."

Shimizu said that county property tax revenues — not an individual's tax bill — went up by 64 percent during his tenure on the commission. "The budget has increased in a large part because of natural growth in the economy. This is a positive sign of development and prosperity. Naturally, revenues have increased because the tax base has expanded."

While commissioners did increase the mill levy slightly, that was done to pay for flood prevention — so the floods of the early 1980s wouldn't happen again — and to build a new county headquarters, needed because the old City-County Building is cracked and unsafe.

Both measures result in "prudent management decisions that in the long run will save the taxpayers millions of dollars," Shimizu said.

He did vote for a salary increase, but only after persuading fellow commissioners to postpone the raises until after an election, so citizens could vote the commissioners out if they



didn't like the raises, and upon recommendations made by a bipartisan committee that included Democratic State Chairman Randy Horiuchi.

"Throughout this campaign I have tried to be completely honest and stick only to the record. I am concerned that Mr. Owens would distort the truth to gain an unfair political advantage," Shimizu said.

Owens countered Shimizu's charge by saying that regardless of what Shimizu himself has tried to do, Owens had to run "an advertisement, on television and radio, that clearly shows the differences in our fiscal conservatism" because four "clearly negative" Shimizu mailers — sent out under others' names or with others' money but all approved by Shimizu himself — may be having an adverse effect on Owens' campaign.

The state Republican Party has mailed out two brochures, one to 70,000 households, another to 130,000 households, that criticize Owens' congressional voting record and ask voters to, "Know the man by the company he keeps."

Owens has previously criticized the brochure mailed to 70,000 households, calling it full of baloney, bunk and bull. He says the newest mailer, which pictures Owens standing next to Ted Kennedy, Tip O'Neill and other leading Democrats, and Shimizu next to Ronald Reagan and prominent Republicans, is unfair and misleading.

GOP State Executive Director Gregg McDonough said the party spent $8,000 on the first brochure, about $15,000 on the second.

Owens also doesn't like a p[illegible]nal endorsement letter sent out by [illegible]rba-ra Smith, former president of [illegible]LDS Church's Relief Society, in f[illegible]r of Shimizu, or a Mailogram sen[illegible]t by Sen. Orrin Hatch, R-Utah, t[illegible]asks the reader to, "Stop liberal [illegible]tern Democrats from buying Ut[illegible]2nd Congressional District," by su[illegible]ting Shimizu.

The latter two mailings w[illegible]sent out by the Shimizu campai[illegible]self, said Shimizu spokesman Gr[illegible]Hop-kins.

Even though Owens' own p[illegible]nows him leading Shimizu, Owens[illegible]d, he couldn't allow the four [illegible]ative pieces" to go unanswered. So [illegible]ecid-ed to run the TV and radio a[illegible]

"The (TV and radio) ads c[illegible]show factual, fiscal records of how [illegible]two of us have voted," Owens sai[illegible]took the numbers from what Ton[illegible]nself told me he did." He said his [illegible]are certainly more fair than the [illegible]bro-chures printed and mailed by [illegible]state GOP that attack him.

00407626

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1986

K. Helen Oniki, Treasurer
Shimizu For Congress Committee
PO Box 21084
Salt Lake City, UT 84121

Re: MUR 2288

Dear Ms. Oniki:

The Federal Election Commission received a complaint which alleges that the Shimizu For Congress Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2288. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Shimizu For Congress Committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public. 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.

0004076207

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

cc: Mr. Tom Shimuzu

00407828608

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1986

R. Todd Neilson, Treasurer
Utah Republican Party (Federal Account)
643 E. 400 South
Suite A
Salt Lake City, UT 84102

Re: MUR 2288

Dear Mr. Neilson:

The Federal Election Commission received a complaint which alleges that the Utah Republican Party (Federal Account) and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2288. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Utah Republican Party (Federal Account) in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public. 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.

0004076209

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

0004078261 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1986

William J. McManus, Treasurer
Republican National Committee
310 First Street, SE
Washington, DC 20003

Re: MUR 2288

Dear Mr. McManus:

The Federal Election Commission received a complaint which alleges that the Republican National Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2288. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Republican National Committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public. 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.

If you have any questions, please contact Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

00407826112

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1986

M. Kay Christensen, Manager
Wayne Owens For Congress Committee
275 E. South Temple
Suite 300
Salt Lake City, UT 84111

Dear Ms. Christensen:

This letter will acknowledge receipt of your complaint which we received on November 5, 1986, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by the Shimizu For Congress Committee and Ms. K. Helen Oniki as treasurer, the Utah Republican Party (Federal Account) and Mr. R. Todd Neilson as treasurer, and the Republican National Committee and Mr. William J. McManus as treasurer. The respondents will be notified of this complaint within five days.

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 the original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter MUR 2288. Please refer to this number in all future correspondence. If you have any questions, please contact Retha Dixon at (202) 376-3110.

Sincerely,

Charles N. Steele
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure

RECEIVED AT THE FEC
HAND DELIVERED
86 NOV 28 AM : 24
GCC#2122

UTAH REPUBLICAN PARTY

LARRY V. LUNT
Chairman
JUDITH W. PARKER
Vice Chairman
JACK E. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HULL
National Committeewoman
WILBERN T. McDOUGAL
National Committeeman

GREGG M. McDONOUGH
Executive Director

November 26, 1986

86 DEC 1 A9:32
RECEIVED
FEDERAL
ELECTION
COMMISSION

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

Dear Mr. Steele:

In response to your letter dated 14 November 1986, Re: MUR 2288, the Utah Republican Party never violated the Federal Election Campaign Act of 1971. I sincerely hope that the following will answer clearly all questions regarding the allegations. To make it clear and concise, I have taken each allegation and explained why it is not in violation, and also provided the actual documentation for your reference.

A) The Utah Republican Party had 5 candidates running for the 2nd Congressional District, following state convention in June we had two candidates that would run-off on August 19, 1986. Mr. Owens was the only Democrat candidate that had been working since November 1985 on his campaign and the Party felt like the public needed to be educated and informed about Mr. Owens. Thus, we produced a radio spot that was in answer to a television spot he had produced and was to educate the public that Mr. Owens was not a fiscal conservative (see attachment A). The Party paid for this in the amount of $ 5,337.45 on July 10th, which should not be allocated toward any candidate but towards Party building.

B) This is in reference to donations made by the National Republican Congressional Committee and went towards convention and Primary debt. The Utah Republican Party had no involvement in this expenditure.

C) This radio spot (see attachment C) was a follow-up to our first ad, it was educating and informing the public as to a newspaper article in the Village Voice. The total cost was $5,232.90 on October 15th, which was paid for by the State Party for party building purposes and should not be allocated toward any candidate.

643 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

D) "This is the door" mass mailing (see attachment D) as the disclaimer clearly attests, was paid for by the Utah Republican Party. The monies raised in our federal account for volunteer intensive and party building purposes paid for this mass mailing in accordance with 11 CFR 100.2(6).

E) "You can tell" mass mailing (see attachment E) also was clearly disclaimed and was paid for by the Utah Republican Party with strictly party building, volunteer intensive monies raised in our federal account and in accordance with 11 CFR 100.2(b).

F, G, H,) (See attachments F, G, H,) The allegations that these were mailed by the State Party, are absolutely false. The disclaimer clearly states that these mass mailings were paid for by the National Republican Congressional Committee and authorized by the Shimizu Campaign. These mailers were paid for by Coordinated Expenditures. The State Party according to 2 U.S.C. 441a (d)(3) had authorized the National Republican Congressional Committee to serve as an agent in spending Coordinated Expenditures on Shimizu's behalf.

I) Former President Ford did make a stop in Utah, but there was no payment of any kind by the state party made for his visit.

I strongly feel that the Utah Republican Party is clearly within the law in regards to spending limits. We have been very careful to assure that we have met all the requirements of the Federal Election Law.

Thank you for your consideration in this most important matter. I will look forward to your timely response.

Sincerely,

Michael L. Jones
Treasurer

By Gregg M. McDonough
Executive Director

Wayne Owens Script Radio July 86

State Party

(A)

Radio Script

Narrator:	**"A little democrat strategy."**
1st person:	**"Now its gotta be a slogan people will believe."**
2nd person:	**"O.K. how 'bout this, Wayne Owens stands up to liberals in Washington."**
1st person:	"Now that didn't work last time."
2nd person:	"O.K., Owens is not like Kennedy and O'Neil."
1st person:	"that's crazy, they trained Owens."
2nd person:	"Alright, how 'bout this, Wayne Owens - Fiscal conservative!"
Both:	Loud Laughter
Narrator:	"Why has Wayne Owens spent $50,000 on T.V. to convince Utah voters that he's a fiscal conservative, - Wayne you've got some explaining to do!"
	"Paid for by the Utah Republican Party."

C 0 0 4 0 7 8 2 6 1 6

UTAH REPUBLICAN PARTY

LARRY V. LUNT
Chairman
JUDITH W. PARKER
Vice Chairman
JACK E. ROBERTS
Secretary
R. TODD NEILSON
Treasurer
ZENDA HULL
National Committeewoman
WILBERN L. McDOUGAL
National Committeeman

GREGG M. McDONOUGH
Executive Director

(C)

WOULD YOU BELIEVE THAT A NEW YORK CITY NEWSPAPER SAYS UTAH IS ONE OF THE BEST PLACES FOR LIBERALS TO INVEST THEIR POLITICAL CONTRIBUTIONS? A RECENT ARTICLE ENTITLED "AN INVESTMENT GUIDE FOR LIBERALS" CALLS WAYNE OWENS ONE OF THIS YEAR'S BEST INVESTMENTS FOR PEOPLE WHO WANT TO ELECT LIBERLAS TO CONGRESS, THEY SAY THAT OWENS WORKED FOR TED KENNEDY AND THAT HE'LL FIGHT AGAINST THE PROGRAMS OF PRESIDENT REAGAN. BUT WAYNE OWENS TELLS UTAHNS HE'S A CONSERVATIVE. WAYNE, YOU'VE GOT SOME EXPLANING TO DO. PAID FOR BY THE UTAH REPUBLICAN PARTY.

0 2 2 4 0 7 6 2 6 1 7

643 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

UTAH STATE REPUBLICAN PARTY
643 East 400 South
Salt Lake City, Utah 84102

4 0 7 8 2 6 1 8

(D)

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U. S. Postage
PAID
Salt Lake City, Utah
Permit No. 1063

MILY
NT



Room 222
Cannon House Office Building
Washington, D.C.
Wayne Owens' Office, 1973-74

Keep your trash to

THIS IS THE DOOR WAYNE OWENS DOESN'T WANT YOU TO OPEN!

(Because His Record is Locked Up Inside . . .)

2 0 0 4 0 7 8 2 6 1 9

A challenge from the Wayne Owens' campaign . . .

"If they can find something in the record that is inconsistent, they should come forward with that." The Salt Lake Tribune, Tuesday, October 7, 1986

The Record . . .

- A full page ad in the January 6th *Deseret News* sponsored by the "Friends of Wayne Owens Committee," states that Mr. Owens "voted for a balanced federal budget, long before it was fashionable."

  FACT: Not one roll call vote cast during the 93rd Congress called for a balanced federal budget.

- In a letter dated August 22, 1986, Owens claims that "the incoming leadership of the House has promised me a seat on the Energy and Commerce Committee . . ."

  FACT: The September 11 edition of the Capitol Hill newspaper, ROLL CALL, noted that "As many as 12 congressmen have expressed interest in Energy and Commerce . . ." *Wayne Owens is not even mentioned as a possibility.*

- Owens paid political television and radio commercials claim that Owens has a record as a fiscal conservative.

  FACT: He voted with Tip O'Neill **82.7%** of the time. Even more revealing is the fact that Owens voted with Bella Abzug, the self-proclaimed radical feminist from New York, **84%** of the time!

WAYNE OWENS DISTORTS HIS RECORD AND MISREPRESENTS THE FACTS

HERE IS HOW INDEPENDENT ORGANIZATIONS RATE WAYNE OWENS' VOTING RECORD AS COMPARED WITH JAKE GARN AND TIP O'NEILL

	TIP O'NEILL'S RATING	WAYNE OWENS' RATING	JAKE GARN'S RATING
U.S. CHAMBER OF COMMERCE: Pro-business group whose members strongly support free enterprise. 100 is a perfect pro-business score.	19	10	90
NATIONAL TAXPAYERS UNION: Seeks reductions in government spending, taxes and government waste. A high rating supports less government.	17	26	58
WATCHDOGS OF THE TREASURY: A major group that is opposed to increased government spending. A 100 translates into fiscal responsibility.	17	27	89
AMERICAN CONSERVATIVE UNION: Rating is based on issues dealing with foreign policy, social and budgetary issues.	12	10	91
COMMITTEE ON POLITICAL EDUCATION (AFL—CIO): The political arm of big labor. A 100 stands for pro-labor.	95	95	10
AMERICANS FOR DEMOCRATIC ACTION: An organization that supports liberal causes.	70	73	6

2 0 0 4 0 7 8 2 6 2 1

Tom SHIMIZU
For Congress

The Shimizu Record



- ★ Tom Shimizu has balanced the Salt Lake County budget *five years* in a row!
- ★ Tom is an *active* pro-business candidate and has been endorsed by the Chamber of Commerce.
- ★ Tom has worked for economic development to create jobs and promote growth in Utah.
- ★ Tom has made 25,000 decisions that have affected the lives of 700,000 Salt Lake County residents.
- ★ Tom Shimizu is proud of his record.
- ★ Tom Shimizu will continue to work for you and your family in Congress.

ON NOVEMBER 4th . . .

VOTE TO KEEP THE DREAM ALIVE!

Paid for by the
Utah State Republican Party

UTAH STATE REPUBLICAN PARTY
643 East 400 South
Salt Lake City, Utah 84102

2 0 0 4 0 7 8 2 6 2 2

(E)

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You Can Tell A Lot About a Man By The Company He Keeps

WHO REPRESENTS YOU BEST?

WAYNE OWENS OR TOM SHIMIZU



Daniel Rostenkowski
Democrat-Illinois
Reagan Support Score **21%**



Ted Kennedy
Democrat-Massachusetts
Reagan Support Score
27%

WAYNE OWENS



John Dingell
Democrat-Michigan
Reagan Support Score
27%



James Wright
Democrat-Texas
Reagan Support Score **22%**

0 4 0 7 8 2 6 2 4



"Tom has a strong sense of compassion for others and an abiding faith in the future of our country. He shares with me a belief that America's best days are ahead."

President
Ronald Reagan

TOM SHIMIZU



"I've seen Tom become one of the most effective public servants in Utah — He'll make an impact on Utah's future in Washington."

Senator
Orrin Hatch



"Tom is on the right side of the issues which are important to Utah — I welcome his support in Washington."

Senator
Jake Garn



Congressman
Howard Nielson



TOM SHIMIZU



Congressman
Jim Hansen

UTAH'S CONGRESSIONAL TEAM

9 0 0 4 0 7 8 2 6 2 5



Tom SHIMIZU
For Congress

A Commitment To Utah

"We all have a stake in Utah's future. Not only for ourselves, but for our children.

By working to provide opportunities rather than restraints, we'll nourish Utah's growth and development, allowing our children to pursue the American Dream Just as we did."

M. Tom Shimizu

November 4th, Vote to Keep the Dream Alive!

Paid for by the Utah State Republican Party

Permit Holder:
National Republican Congressional Committee
320 First St, SE
Washington, D.C. 20003

(F)

Non-Profit
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Salt Lake City, UT
Permit No. 4651

GOVERNOR BANGERTER NEEDS YOUR HELP . . . IN WASHINGTON.

20040782627



UTAH NEEDS A CONGRESSMAN WHO UNDERSTANDS OUR LOCAL CONCERNS AND KNOWS WHAT NEEDS TO BE DONE TO GET RESULTS.

NORMAN H. BANGERTER
603 East South Temple
Salt Lake City, Utah 84104

Dear Fellow Utahn:

As Governor, my main [illegible]
work and [illegible]

...make Utah a better place to live,

2407626 28

And to achieve those goals, I try to work with Utah's Senators and Congressman on a daily basis.

The ability to work together, as a team, is very important to me. That is why I'd like you to help me, by electing Tom Shimizu to Congress.

Tom has proven to be an excellent public servant during his tenure on the Salt Lake County Commission.

*He has developed a keen sense of understanding of government services and community needs.

*He has proven that services can be delivered effectively within the budget . . . especially to our senior citizens and veterans.

*Tom Shimizu is a hard worker, a proven leader and a trusted public official.

I know that Tom will represent Utah the way you would expect him to, and I know that I could count on his help and support without worrying if he is beholden to other interests.

Please help me help Utah. On November 4th, elect Tom Shimizu to Congress.

Sincerely,

Norman H. Bangerter

Norman H. Bangerter
Governor

P.S. Remember to vote for Tom Shimizu on November 4th.

"OVER 1800 MILES SEPARATES UTAH AND WASHINGTON, D.C. BUT WHEN IT COMES TO SERVING THE NEEDS OF THE PEOPLE, GOVERNOR BANGERTER AND I WILL WORK TOGETHER AS A TEAM."

Tom Shimizu



UTAH





WASHINGTON, D.C.

ON NOVEMBER 4th
ELECT TOM SHIMIZU TO CONGRESS
VOTE TO KEEP THE DREAM ALIVE

Paid for by the National Republican Congressional Committee authorized by the Shimizu for Congress Committee.

9004078 4630

Permit Holder:
National Republican Congressional Committee
320 First St, SE
Washington, D.C. 20003

(G)

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Salt Lake City, UT
Permit No. 4651

RONALD REAGAN NEEDS YOUR HELP ON NOV. 4TH

2 0 0 4 0 7 6 2 6 3 1

"THE LAST TWO YEARS OF PRESIDENT REAGAN'S TERM ARE VITALLY IMPORTANT TO THE COMPLETION OF HIS ECONOMIC PROGRAM."

--Tom Shimizu

RONALD REAGAN

Dear Second District Voter:

I am writing to ask for your vote for one of the finest Republican [illegible] and a strong supporter of mine, Tom Shimizu, who [illegible]

During [illegible]

...s of our Administration, we've been able to realize many of our goals: ...a return to family values, building greater economic prosperity and restoring a sense of pride and confidence in America. A lot of that progress could have come much faster if we had more Republicans like Tom Shimizu working with us in Congress.

America is at a critical point. We must continue our Republican policies of reducing the massive federal deficit, keeping inflation low and preserving peace in the world.

Tom has the energy and commitment to help us achieve those aims, and to be an effective member of our Republican team. That's why I'm asking you to send him to Washington as your Representative.

Tom Shimizu symbolizes some of the finest traditions of public service. He has a strong sense of compassion for others and an abiding faith in the future of our country. He shares with me a belief that America's best days are ahead.

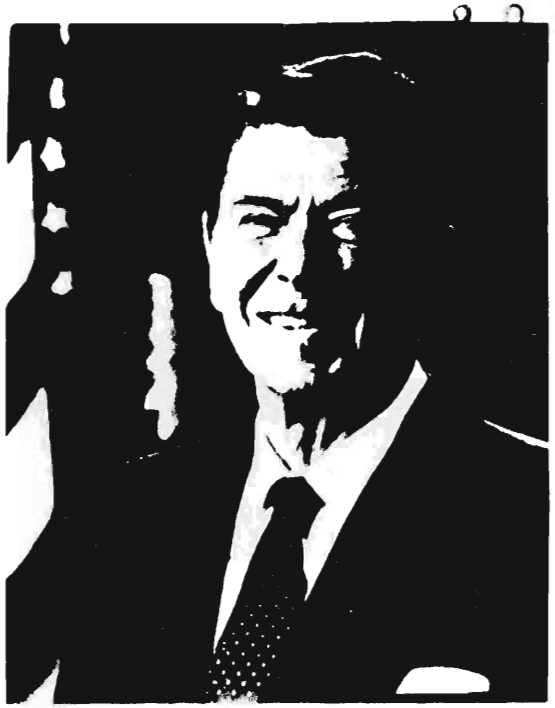
I'm confident that Tom has the ability to be one of the best Congressmen that Utah has ever seen. Please give him your vote on November 4.

Sincerely,

Ronald Reagan

P.S. Tom Shimizu's campaign is very important to me. Please use your vote to make him your new Congressman. Thank you.

Paid for by the National Republican Congressional Committee authorized by the Shimizu for Congress Committee.



THE CHOICE HAS NEVER BEEN MORE CLEAR

ON NOV. 4TH VOTE TO KEEP THE DREAM ALIVE



Tom SHIMIZU
For Congress

4078634

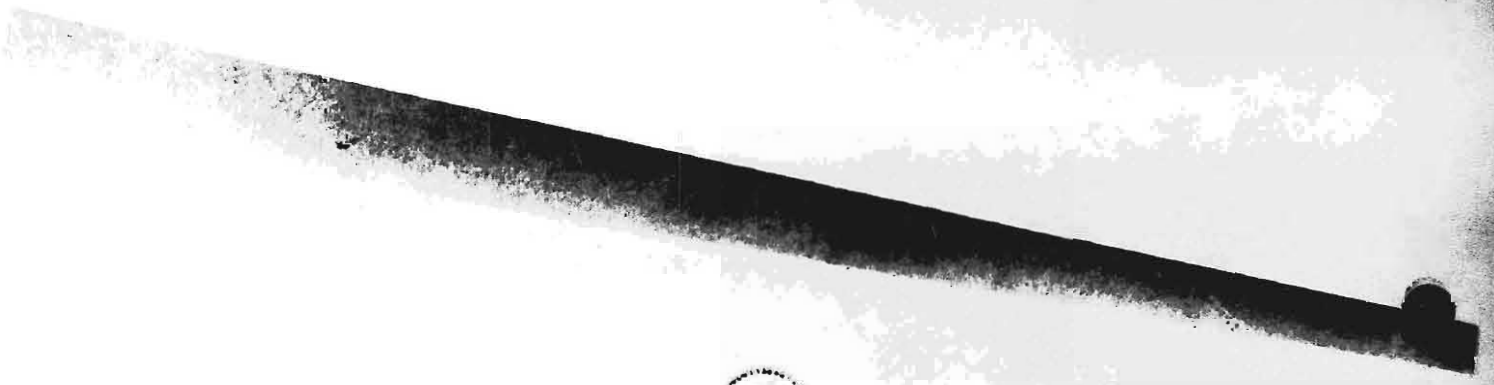
RONALD REAGAN NEEDS YOUR HELP ON NOV. 4TH

SUPPLEMENT TO THE
SALT LAKE TRIBUNE AND DESERET
NEWS MONDAY, NOVEMBER 3RD 1986

9 0 7 4 0 7 2 6 3 5

"THE LAST TWO YEARS OF PRESIDENT REAGAN'S TERM ARE VITALLY IMPORTANT TO THE COMPLETION OF HIS ECONOMIC PROGRAM."

--Tom Shimizu



RONALD REAGAN

Dear Second District Voter:

I am writing to ask for your vote for one of the finest Repu
and a strong supporter of mine, Tom Shimi

...ming for Congress in your district.

...six years of our Administration, we've been able to realize many of our goals: promoting a return to family values, building greater economic prosperity and restoring a sense of pride and confidence in America. A lot of that progress could have come much faster if we had more Republicans like Tom Shimizu working with us in Congress.

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Sincerely,

Ronald Reagan

P.S. Tom Shimizu's campaign is very important to me. Please use your vote to make him your new Congressman. Thank you.

Paid for by the National Republican Congressional Committee authorized by the Shimizu for Congress Committee.



THE CHOICE HAS NEVER BEEN MORE CLEAR

ON NOV. 4TH VOTE TO KEEP THE DREAM ALIVE



Tom SHIMIZU
For Congress

GCA# 2143
RECEIVED AT THE FEC
86 DEC 1 A11 : 54
86 DEC 2 P3: 32
GENERAL COUNSEL

Tom SHIMIZU '86
For Congress in

November 28, 1986

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

Dear Mr. Steele:

In response to your letter dated November 14, 1986, and received on November 17, 1986, the Shimizu for Congress Committee did not violate the Federal Election Campaign Act of 1971. I hope that the following will answer clearly all questions regarding the allegations. To make it clear and concise, I have taken each allegation and explained why it is not in violation.

(a) The Utah Republican Party had five candidates running for the Second Congressional District. Following State Convention in June, there were two candidates that would run-off in the Primary Election on August 19, 1986. Mr. Owens was the only Democrat candidate that had been working since November, 1985 on his campaign, and the Party felt that the public needed to be educated and informed about Mr. Owens. Thus, they produced a radio spot that was in answer to a television spot he had produced and was to educate the public that Mr. Owens was not a fiscal conservative. The Party paid for this in the amount of $5337.45 on July 10th, which should not be allocated toward any candidate but towards Party building.

(b) This is in reference to donations made by the National Republican Congressional Committee and went towards Mr. Shimizu's State Convention and Primary Election debts. The Utah Republican Party had no involvement in this expenditure.

(c) This radio spot was a follow-up to the Party's first ad. It was educating and informing the public as to a newspaper article in The Village Voice. The total cost was $5232.90 on October 15th, which was paid for by the State Party for Party building purposes and should not be allocated toward any candidate.

(d) "This is the Door" mass mailing, as the disclaimer clearly attests, was paid for by the Utah Republican Party. The monies raised in the Party's federal account for volunteer intensive and Party building purposes paid for this mass mailing in accordance with 11 CFR 100.2(6).

P.O. BOX 21084 Salt Lake City, Utah 84121 Phone (801) 328-0160
Paid for by the Shimizu for Congress Committee

(e) "You Can Tell" mass mailing was also clearly disclaimed and was paid for by the Utah Republican Party with strictly Party building, volunteer intensive monies raised in its federal account and in accordance with 11 CFR 100.2(b).

(f, g, h) The allegations that these were mailed by the State Party are incorrect. The disclaimer clearly states that these mass mailings were paid for by the National Republican Congressional Committee and authorized by the Shimizu Campaign. These mailers were paid for by Coordinated Expenditures. The State Party, according to 2U.S.C. 44la (d) (3), had authorized the National Republican Congressional Committee to serve as an agent in spending Coordinated Expenditures on Mr. Shimizu's behalf.

(i) Former President Ford did make a stop in Utah, but there was no payment made of any kind by the State Party for his visit.

I strongly feel that the Shimizu for Congress Committee is clearly within the law. We have been very careful to assure that we have met all the requirements of the Federal Election Law.

Thank you for your consideration in this important matter. I look forward to your response.

Sincerely,

K. Helen Oniki

K. Helen Oniki
Treasurer

0004076439

GCC#2157
RECEIVED AT THE FEC

86 DEC 3 A9:31

Republican National Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

December 1, 1986

16 DEC 3 A11:26

Lois G. Lerner, Esq.
Associate General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

RE: MUR 2288

ATTN: Eric Kleinfeld

Dear Ms. Lerner:

I am writing in response to your letter of November 14, 1986, addressed to Mr. William J. McManus, Treasurer of the Republican National Committee, stating that the Federal Election Commission has received a complaint alleging that the Republican National Committee (RNC) may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (FECA).

Your letter enclosed what purports to be a complaint from M. Kay Christensen, Manager of the Wayne Owens for Congress Committee. This complaint provides no specific, or general, factual allegation upon which it is possible to conclude that the RNC may have violated any provisions of the FECA. The supposed complaint contains no reference in its body or attached newspaper articles to any actions, lawful or otherwise, of the Republican National Committee. The first sentence of the letter submits that the letter is a complaint against the Republican National Committee, yet nowhere does the letter detail any actions, expenditures, or contributions by the RNC.

The newspaper clippings, which were attached to the complaint, and, I assume, were for the purpose of providing substance to the complaint, fail to make any reference to actions of the Republican National Committee. The RNC has made no contribution or expenditure to the Shimizu for Congress Committee which exceeds federal limitations.

Since the complaint does not contain a clear and concise recitation of facts (or any facts referencing the RNC) which describe a violation of the FECA by the RNC, and the documentation (newspaper accounts) purporting to support the complaint fails to refer to any RNC action, the complaint is insufficient, on its face, pursuant to the Commission regulations [11 CFR Section 111.4(d)], so the Commission should take no further action.

Very truly yours,

Mark Braden

E. Mark Braden

EMB:jd

0004076241

SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION _____

MUR 2288
DATE COMPLAINT RECEIVED BY OGC November 5, 1986
DATE OF NOTIFICATION TO RESPONDENT November 14, 1986
STAFF Eric Kleinfeld

COMPLAINANT'S NAME: M. Kay Christensen

RESPONDENTS' NAMES: Shimizu for Congress Committee
K. Helen Oniki, treasurer
Utah Republican Party (Federal Account)
R. Todd Neilson, treasurer
Republican National Committee
William J. McManus, treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(b)
2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(d)(3)(A)
11 C.F.R. § 100.7

INTERNAL REPORTS CHECKED: Disclosure Reports
Advisory Opinions 1984-15, 1985-14

FEDERAL AGENCIES CHECKED: N/A

Summary of Allegations

On November 5, 1986, the Office of the General Counsel of the Federal Election Commission ("Commission") received a signed, sworn and notarized complaint from M. Kay Christensen alleging violations of the Federal Election Campaign Act of 1971, as amended ("Act") by the Shimizu for Congress Committee ("Shimizu Committee"), the Utah Republican Party ("Party") and the Republican National Committee ("RNC"). Tom Shimizu was the Republican candidate for the United States House of Representatives in 1986 from the Second Congressional District of Utah.

0004076442

Factual and Legal Analysis

Specifically, complainant alleges that the Party and the RNC exceeded the limitations on contributions to and coordinated expenditures on behalf of the Shimizu Committee, with a variety of mailings and newspaper inserts which were distributed prior to the general election of November 4, 1986. Complainant lists eight expenditures and one contribution, totalling $72,948, which she claims exceed the Party's expenditure limit for 1986.

Notification letters were mailed to all respondents. Responses were received from all parties by December 1, 1986. The Office of the General Counsel had prepared a First General Counsel's Report containing recommendations on this matter. However, the recent decision of the Ninth Circuit in FEC v. Furgatch, ___ F.2d ___ (9th Cir., 1987) compels further review and analysis of MUR 2288. The court's decision appears to be directly relevant to the Commission's consideration of the legal issues involved. Therefore, upon completion of this additional analysis, the Office of the General Counsel will present its report with recommendations to the Commission.

Charles N. Steele
General Counsel

1/13/87
Date

By: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

0040726245

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION _____

MUR 2288
DATE COMPLAINT RECEIVED BY OGC November 5, 1986
DATE OF NOTIFICATION TO RESPONDENT November 14, 1986
STAFF Eric Kleinfeld

COMPLAINANT'S NAME: M. Kay Christensen

RESPONDENTS' NAMES: Shimizu for Congress Committee
K. Helen Oniki, treasurer
Utah Republican Party (Federal Account)
R. Todd Neilson, treasurer
Republican National Committee
William J. McManus, treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(b)
2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(d)(3)(A)
11 C.F.R. § 100.7

INTERNAL REPORTS CHECKED: Disclosure Reports
Advisory Opinions 1984-15, 1985-14

FEDERAL AGENCIES CHECKED: N/A

Summary of Allegations

On November 5, 1986, the Office of the General Counsel of the Federal Election Commission ("Commission") received a signed, sworn and notarized complaint from M. Kay Christensen alleging violations of the Federal Election Campaign Act of 1971, as amended ("Act") by the Shimizu for Congress Committee ("Shimizu Committee"), the Utah Republican Party ("Party") and the Republican National Committee ("RNC"). Tom Shimizu was the Republican candidate for the United States House of Representatives in 1986 from the Second Congressional District of Utah.

0004076464

Specifically, complainant alleges that the Party and the RNC exceeded the limitations on contributions to and coordinated expenditures on behalf of the Shimizu Committee, with a variety of mailings and newspaper inserts which were distributed prior to the general election of November 4, 1986.

Factual and Legal Analysis

Complainant lists eight expenditures and one contribution, totalling $72,948, which she claims exceed the Party's expenditure limit for 1986. Complainant's list is as follows:

(a)	Pre-primary Anti-Owens radio spot, paid for by State Party (7/13/86)	$ 5,000,00
(b)	RCCC Donation (9/16/86)	$10,000.00
(c)	"Village Voice" radio spot, paid for by State Party (10/6/86)	$ 5,000.00
(d)	"This is the Door" mailing, mailed by State Party (10/29/86)	$ 8,000.00
(e)	"You Can Tell" mailing, mailed by State Party (10/29/86)	$15,000.00
(f)	Letter to Voters from Gov. Bangerter (11/1/86), mailed by State Party	$ 8,000.00 (estimated)
(g)	Letter from President Reagan mailed by State Party (11/1/86)	$ 8,000.00
(h)	Newspaper inserts of both letters (11/3/86) described in (f) and (g) above.	$ 3,948.00 (estimated)
(i)	Costs associated with fund-raising appearance by former President Ford	$10,000.00
	TOTAL	$72,948.00

0040782545

According to complainant, these items establish a violation of the Act by exceeding the amounts which may be spent on behalf of a candidate for the House of Representatives.

Notification letters were mailed to respondents on November 14, 1986. The RNC responded by letter dated December 1, 1986. The RNC argues that the complaint contains no allegations against it. Additionally, the RNC states that it "made no contribution or expenditure to the Shimizu for Congress Committee which exceeds federal limitations."

The Shimizu Committee responded on December 1, 1986. In a two page letter, the Shimizu Committee addresses each of complainant's items to demonstrate that no violation of the Act occurred.

The Party's response, also received on December 1, 1986, consists of the same two page letter supplied by the Shimizu Committee, as well as a series of attachments purporting to be several of the items complained of.

The national committee of a political party and a state committee of a political party may each make expenditures in connection with the general election campaign of a candidate for the U.S. House of Representatives who is affiliated with that party. 2 U.S.C. § 441a(d) and 11 C.F.R. 110.7(b)(1). For House candidates in states with more than one Congressional district, the 1986 limit on coordinated party expenditures is $21,810. See FEC Record, Volume 12, Number 4, April 1986. Neither the

2004026415

national committee of a political party nor a state committee of a political party is permitted to make independent expenditures on behalf of the party's candidate for Congress. 11 C.F.R. § 110.7(b)(4).

The state party is entitled to make a $5000 contribution to the Shimizu Committee in addition to its coordinated party expenditures, pursuant to 2 U.S.C. § 441a(a)(2)(A).

The application of Section 441a(d) limitations was addressed by the Commission in Advisory Opinions 1984-15 and 1985-14. In AO 1984-15, the Commission determined that disbursements for advertisements made by the Republican National Committee ("RNC") were expenditures subject to the limitations of Section 441a(d) where the ad depicted a clearly identified candidate and conveyed an electioneering message. The Commission indicated that the clearly identified candidate may be negatively portrayed.

In AO 1985-14, the Democratic Congressional Campaign Committee ("DCCC") proposed conducting campaigns in a number of specific congressional districts with the clear purpose of influencing voter perceptions of Republican candidates and with a view towards weakening their positions as candidates for re-election in 1986. The Commission again stated that the two factors contained in AO 1984-15, noted above, are to be considered when determining whether expenditures were subject to Section 441a(d). Moreover, citing 2 U.S.C. § 431(18) and

0040782647

11 C.F.R. § 106.1(d), a candidate was said to be "clearly identified" if his or her name or likeness appears on the communication or if his or her identity is apparent by unambiguous reference.

Additionally, citing United States v. United Auto Workers, 352 U.S. 567, 587 (1957), the Commission determined that "electioneering messages" included statements "designed to urge the public to elect a certain candidate or party." The Commission addressed a number of proposed ads and determined that mailers containing negative statements about a named Republican Congressman distributed within that Congressman's district are expenditures subject to Section 44la(d) limitations, whether or not such mailers included the words "vote Democratic." In reaching this conclusion, the Commission recognized that there may not be an announced or qualified Democratic candidate in congressional districts chosen to receive the DCCC's proposed communications.

In addition to the AO's, the Commission also faced a similar issue in MUR 2116 as to whether certain expenditures made by the RNC in a Rhode Island congressional race were allocable under Section 44la(d). The communication in question named a specific Congressman and criticized his alleged use of his public position to help wealthy investors. The mailer circulated in the Congressman's district, but did not mention the Congressman's voting record on any issues, did not cite any inconsistencies in

the Congressman's positions, and did not contain any words of express advocacy. Instead, the mailer stated the Congressman must disclose his taxes and finances. The Commission failed to find by four affirmative votes that this mailer constituted an expenditure subject to Section 441a(d), and closed the file.

Thus, in the instant case, the inquiry into whether the costs of the activities in question are expenditures subject to the limitations of Section 441a(d), focuses on a clearly identified candidate and an electioneering message. An electioneering message may be either express advocacy or a message designed to influence the voter to support a particular candidate. Two recent court cases also provide some guidance for the analysis herein and more specifically, for the issue of express advocacy. The first of these, FEC v. Massachusetts Citizens for Life, 55 U.S.L.W. 4067 (U.S. Dec. 15, 1986) peripherally touched on the issue of what constitutes express advocacy. The Supreme Court considered the essential nature of the message, in determining whether the publication at issue contained a sufficient exhortation to qualify as express advocacy.

A more detailed analysis of express advocacy was discussed by the Court of Appeals for the Ninth Circuit in FEC v. Furgatch, _____ F.2d _____ (9th Cir. 1987). The court based its analysis on the proposition that express advocacy is not strictly limited to communications using certain key words or phrases, i.e., those listed by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), but the speech at issue must be read as a whole.

If that speech conveys an exhortation through some form of a call to action, and that call to action is unambiguous, in that it cannot be reasonably interpreted to mean anything else, the requirement of express advocacy is satisfied.

1. Respondents' Expenditures Are Subject to the Limitation of Section 441a(d)

The expenditures cited by complainant include two radio advertisements and four mailings, which are discussed below. Of the amounts spent on these expenditures, all but approximately $5000 was apparently spent in the month preceding the general election.

a. Radio advertisements

In July, 1986, the Party paid $5337.45 for an anti-Wayne Owens radio spot. While the Party had two candidates involved in a run-off for the Republican nomination for the Second District on August 19, 1986, it concluded that the ad was necessary since "Mr. Owens was the only Democrat [sic] candidate that had been working since November 1985 on his campaign." The transcript of this ad reads as follows:

Radio Script

Narrator:	"A little democrat strategy."
1st person:	"Now its gotta be a slogan people will believe."
2nd person:	"O.K. how 'bout this, Wayne Owens stands up to liberals in Washington."
1st person:	"Now that didn't work last time."
2nd person:	"O.K., Owens is not like Kennedy and O'Neil."
1st person:	"that's crazy, they trained Owens."

2nd person: "Alright, how 'bout this, Wayne Owens - Fiscal conservative!"

Both: Loud Laughter

Narrator: "Why has Wayne Owens spent $50,000 on T.V. to convince Utah voters that he's a fiscal conservative, - Wayne you've got some explaining to do!"

"Paid for by the Utah Republican Party."

In October, 1986, the Party paid $5232.90 for a second radio spot, based on a newspaper article which appeared in the Village Voice newspaper. The transcript reads as follows:

WOULD YOU BELIEVE THAT A NEW YORK CITY NEWSPAPER SAYS UTAH IS ONE OF THE BEST PLACE FOR LIBERALS TO INVEST THEIR POLITICAL CONTRIBUTIONS? A RECENT ARTICLE ENTITLED "AN INVESTMENT GUIDE FOR LIBERALS" CALLS WAYNE OWENS ONE OF THIS YEAR'S BEST INVESTMENTS FOR PEOPLE WHO WANT TO ELECT LIBERLAS TO CONGRESS, THEY SAY THAT OWENS WORKED FOR TED KENNEDY AND THAT HE'LL FIGHT AGAINST THE PROGRAMS OF PRESIDENT REAGAN. BUT WAYNE OWENS TELLS UTAHNS HE'S A CONSERVATIVE. WAYNE, YOU'VE GOT SOME EXPLANING TO DO. PAID FOR THE THE UTAH REPUBLICAN PARTY.

This situation is similar to the DCCC proposal in AO 1985-14, the running of advertisements in Congressional districts with the purpose of influencing voter perception of the opposition

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candidates and weakening the latters' support. Just as the DCCC's proposed ads which identified specific Congressman by name were determined to be subject to the Act's limitations, here the identification of Wayne Owens by name plus the ads' content make them subject to the Act's limitations.

The electioneering message of the ads is evident from the transcripts. Under the reasoning of Furgatch, these ads expressly advocate the defeat of Wayne Owens. Not only does the first ad identify Owens' party affiliation, but the fact that Owens is a candidate is evident from the language indicating that Owens is spending $50,000 to convince Utah voters of something that the ad suggests is untrue. The second ad contains the electioneering message that Owens is an investment for political contributions from people who want to elect liberals to Congress. Both are marked by an unambiguous call to action which cannot be reasonably interpreted in any alternative way. The call to action does not have to be stated in certain words, but only leave an obvious blank for the recipient to fill in. Here, the messages are negative, that Owens is telling Utahans he is a conservative, when that may not be the reality. This suggestion that Owens is lying leads to the unambiguous conclusion that the recipient should vote against him.

Moreover, even were these ads not to be considered expressly advocating the defeat of Owens, electioneering is still present under the reasoning of UAW, that the ads were designed to influence the recipient to vote agaist Owens. The content of the ads when read as a whole make evident a design to create a negative feeling about Owens, through the fact that he is either a liberal or just not being honest with Utah voters.

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The Party's claim that these ads are party building is without merit. In addition the fact that the first ad was broadcast prior to the party having its own nominee will not alter the conclusions herein. Although coordinated party expenditures may only be made in connection with the general election, 2 U.S.C. § 44la(d), such expenditures are not necessarily restricted to the time period between nomination and election. See Advisory Opinions 1984-15, 1985-14. Instead, where a candidate appears assured of a party's nomination, the general election campaign, at least from the political party's pespective, may begin prior to formal nomination. See also, MUR 2186. Here, the Party recognized and admits that Mr. Owens was assured of his party's nomination.

Accordingly, the amounts spent on these two radio advertisements should be considered coordinated party expenditures subject to the limitations of Section 44la(d) and should have been reported as such. 1/

b. Mailings

The complaint complained of four mailings by the Party. The Party's response indicates that while it conducted two of the mailings, the other two were actually made by the National Republican Congressional Committee ("NRCC").

With respect to the two mailings made by the Party, the first, entitled "This is the door," consists of one page

1/ Reporting problems will be dealt with later in this report. However, it should be noted that the Party apparently failed to report any amount for these radio spots.

discussing purported inconsistencies in Owens' record, one page on rating Owens' voting record, and one page on Tom Shimizu's (the Republican nominee) record.

The second mailing, entitled "You can tell," consists of one page rating Owens' support for other Democrats, one page of endorsements of Shimizu from President Reagan and Utah's Senators, and one page containing a statement by Shimizu.

The Party claims these mailings were for "party building" purposes. In light of the language of these mailings, such a claim is disingenuous. The electioneering aspects of both mailings are obvious. The "This is the door" mailing states:

> Tom Shimizu for Congress...
> On November 4th...
> Vote to Keep the dream alive!

The "You can tell" mailing also includes the language,

> Tom Shimizu for Congress....
> On November 4th, Vote to
> Keep the Dream Alive!

In light of the obvious electioneering aspects of these mailings, the costs for both should be considered coordinated party expenditures subject to the limitations of Section 441a(d) and should have been reported as such.

With respect to the two mailings undertaken by the NRCC, the first consists of an endorsement by Utah Governor Bangerter and the second an endorsement by President Reagan. The latter was also a newspaper advertisement in the Salt Lake Tribune and Deseret News on November 3, 1986.

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The Party admits that the two NRCC mailings and newspaper advertisement were coordinated party expenditures and states that it authorized the NRCC to serve as agent in making coordinated party expenditures on behalf of Shimizu. 2/

The amounts spent on the mailings is not clear at this stage. The Party's reports do not disclose any apparent amounts for the two mailings made by it. The NRCC spent a total of $39,652.17 in coordinated party expenditures on behalf of Shimizu. However, from the NRCC's reports, it is not clear exactly what amounts were spent on the two mailings and newspapers article paid for by the NRCC.

In 1986, the spending limit for party committees for House races in states with more than one Congressional district was $21,810, under 2 U.S.C. § 441a(d)(3). Both the Party and the NRCC have a separate spending limit for the House race at issue. The Party is permitted to authorize the NRCC to make coordinated party expenditures on behalf of Shimizu (in effect authorizing the NRCC to spend for it) if the authorization is made in writing prior to the Party having spent its limit.

2/ Although the Party states that it authorized the NRCC to make these expenditures, it has provided no documentation or evidence that the authorization was made in writing prior to the time the expenditures were made as required for an effective authorization.

Here, the following coordinated party expenditures were made:

Utah Republican Party	
Anti Owens ad (July 13, 1986)	$ 5337.45 3/
Village Voice ad (Oct 6, 1986)	5232.90
This is the door mailing (Oct 29, 1986)	8000
You can tell mailing (Oct 29, 1986)	15,000
Total	$33,570.35
NRCC	
Bangerter endorsement (Nov 1, 1986)	$ 8,000
Reagan endorsement (Nov 1, 1986)	8,000
Newspaper ad (Nov 3, 1986)	3,948
Total	$19,948
Total from NRCC reports	$39,652.17

Thus, it appears that a total of $73,222.52 was spent in coordinated party expenditures by the Party and the NRCC for this Congressional district, when the total combined limit for the Party and the NRCC was $43,620, resulting in an excess of nearly $30,000. 4/ Accordingly, the Office of General Counsel

3/ Only the amounts for the radio ads were supplied by respondents; the remaining figures were supplied by complainant.

4/ Additionally, one of the activities complained of is a purported fundraiser at which former President Gerald Ford appeared. Complainant asserts the costs of this fundraiser should be included as a coordinated party expenditure. Complainant does not indicate what the purpose of the fundraiser was. The Party states former President Ford did make a stop in Utah, but there was no payment of any kind by the state party made for his visit. Therefore, in the opinion of the Office of General Counsel, it is unclear whether the costs of the fundraisers should be included in the coordinated party expenditure limit of the Party, given the question as to whether any expenditure was made in relation to the Shimizu campaign.

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recommends that the Commission find reason to believe that the Utah Republican Party and R. Todd Neilson, as treasurer, and the NRCC and Jack McDonald, as treasurer, violated 2 U.S.C. § 441a(d). 5/

Reporting Problems

Each person who receives any expenditure from a reporting committee in connection with a Section 441a(d) expenditure must be identified, and the date, amount and purpose of the expenditure. 2 U.S.C. § 434(b)(6)(B)(iv); 11 C.F.R. § 104.3(b)(3)(viii). A committee reporting a Section 441a(d) expenditure must also include the name of the candidate on behalf of whom the expenditure is made and the office sought. Id.

A review of the Party's reports reveals that no coordinated party expenditures were disclosed on Schedule F, and in fact, the amounts spent for the ads and mailings may not have been reported at all. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Utah Republican Party and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(iv).

Disclaimer Problems

Whenever any person makes an expenditure for the purpose of financing a communication expressly advocating the election or defeat of a clearly identified candidate, such communication, if not paid for by a candidate or authorized committee, must clearly

5/ The NRCC is not a named respondent in the complaint and therefore will be sent a Factual and Legal Analysis concerning this matter.

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state the name of the person who paid for it and whether a candidate or authorized committee authorized it. 2 U.S.C. § 441d(a)(2) and (3).

A review of the mailings reveals that those made by the NRCC contain sufficient disclaimers. However, the two mailings by the Party, as well as the two radio advertisements merely state, "Paid for by the Utah Republican Party." None of these items contain an authorization statement and are therefore, insufficient under Section 441a(d). Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Utah Republican Party and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 441d(a).

Shimizu Committee

Complainant alleges that the Shimizu Committee received a $10,000 contribution from the "RCCC," as one of the items in excess of the Act's limitations. Attached to the complaint is a September 6, 1986 article of the Salt Lake Tribune indicating that the NRCC presented Shimizu with "checks totalling $10,000." The reports of the Shimizu Committee for this period do not reflect the receipt of these funds. However, the NRCC reports two $5000 contributions to the Shimizu Committee on its 1986 September Monthly report. The Shimizu Committee is required to report the receipt of these funds. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Shimizu Committee and K. Helen Oshiki, as treasurer, violated 2 U.S.C. § 434(b)(2).

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RNC

The complainant specifically names the RNC as a respondent. However, as the RNC points out in its response to the complaint, no specific action of the RNC is complained of. None of the coordinated party expenditures which make up the allegations of the complaint were made by the RNC. Accordingly, the Office of General Counsel recommends that the Commission find no reason to believe that the RNC and William J. McManus, as treasurer, violated the Act.

Recommendations

The Office of General Counsel recommends that the Commission:

1. Find reason to believe that the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 441a(d), § 441d(a) and § 434(b)(6)(B)(iv).

2. Find reason to believe that the National Congressional Committee and Jack McDonald as treasurer, violated 2 U.S.C. § 441a(d).

3. Find reason to believe that the Shimizu for Congress Committe and K. Helen Oshiki, as treasurer, violated 2 U.S.C. § 434(b)(2).

4. Find no reason to believe that the Republican National Committee and William J. McManus, as treasurer, violated the Federal Election Campaign Act of 1971, as amended.

5. Approve the attached letters.

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6. Approve the attached Factual and Legal Analysis.

Charles N. Steele
General Counsel

Date 2/20/87

By: Lawrence M. Noble
Deputy General Counsel

Attachments
A. "This is the door" mailing
B. "You can tell" mailing
C. Bangerter endorsement mailing
D. Reagan endorsement mailing
E. Reagan endorsement advertisement
F. Response of the Utah Republican Party
G. Response of the Shimizu Committee
H. Response of the RNC
I. Letters
J. Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN JM

DATE: FEBRUARY 26, 1987

SUBJECT: OBJECTION TO MUR 2288 - FIRST G.C. REPORT
SIGNED FEBRUARY 20, 1987

The above-captioned document was circulated to the Commission on Tuesday, February 24, 1987 at 11:00 A.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	X
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the Executive Session agenda for March 10, 1987.

0024078256 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Shimizu for Congress Committee	)	
K. Helen Oniki, treasurer	)	
Utah Republican Party (Federal	)	MUR 2288
Account) and	)	
R. Todd Neilson, treasurer	)	
Republican National Committee	)	
William J. McManus, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 10, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2288:

1. Find reason to believe that the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. §§ 441a, 441a(d), 441d(a), and 434(b)(6)(B)(iv).

2. Take no action at this time with respect to recommendation number 2 in the General Counsel's report dated February 20, 1987.

3. Find reason to believe that the Shimizu for Congress Committee and K. Helen Oshiki, as treasurer, violated 2 U.S.C. § 434(b)(2).

(continued)

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4. Find no reason to believe that the Republican National Committee and William J. McManus, as treasurer, violated the Federal Election Campaign Act of 1971, as amended.

5. Direct the Office of General Counse to send appropriate letters pursuant to the above actions.

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

Attest:

3-12-87
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

March 31, 1987

E. Mark Braden, Esquire
Republican National Committee
310 First Street, N.E.
Washington, D.C. 20003

RE: MUR 2288
Republican National Committee
and William J. McManus,
treasurer

Dear Mr. Braden:

On November 4, 1986, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 10, 1987, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed by the Republican National Committee. Accordingly, the Commission closed its file in this matter as it pertains to your clients. This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
Acting General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 31, 1987

R. Todd Neilson
Utah Republican Party (Federal Account)
643 East 400 South
Salt Lake City, Utah 84102

RE: MUR 2288
Utah Republican Party (Federal Account) and R. Todd Neilson, treasurer

Dear Mr. Neilson:

The Federal Election Commission notified the Utah Republican Party (Federal Account) and you, as treasurer, (the "Party") on November 14, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on March 10, 1987, determined that there is reason to believe that the Party and you, as treasurer, have violated certain provisions of the Act.

A. Findings Relating to 2 U.S.C. §§ 441a(d) and 441a

The Commission determined that there is reason to believe that the Party and its treasurer violated 2 U.S.C. § 441a(d) by exceeding the limitation on coordinated party expenditures in the 1986 House campaign in the second Congressional district of Utah. Additionally, the Commission determined that there is reason to believe the Party and its treasurer violated 2 U.S.C. § 441a by exceeding the Act's contribution limitations regarding these expenditures. The expenditures which exceeded these limitations were for the items contained in the complaint originally forwarded to you, the four mailings, two radio advertisements and one newspaper advertisement.

B. Findings Relating to 2 U.S.C. § 434(b)(6)(B)(iv)

The Commission determined that there is reason to believe the Party and its treasurer violated 2 U.S.C. § 434(b)(6)(B)(iv), by failing to report expenditures made for two mailings and two radio advertisements as coordinated party expenditures on Schedule F of its reports.

C. Findings Relating to 2 U.S.C. § 441d

The Commission determined that there is reason to believe that the Party and its treasurer violated 2 U.S.C. § 441d(a), by failing to include a sufficient disclaimer on two mailings and two radio advertisements.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within fifteen days of your receipt of this notification.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

This matter will remain 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 your clients wishes the matter to be made public.

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

Sincerely,

Scott E. Thomas
Chairman

Enclosures
Procedures

0004076565

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 31, 1987

K. Helen Oshiki, treasurer
Shimizu for Congress Committee
P.O. Box 21084
Salt Lake City, Utah 84121

RE: MUR 2288
Shimizu for Congress Committee
and K. Helen Oshiki,
treasurer

Dear Ms. Oshiki:

The Federal Election Commission notified the Shimizu for Congress Committee and you, as treasurer, on November 14, 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on March 10 , 1987, determined that there is reason to believe that the Shimizu for Congress Committee and you, as treasurer, have violated 2 U.S.C. § 434(b)(2), a provision of the Act. Specifically, it appears that the Shimizu for Congress Committee and you, as treasurer, failed to report $10,000 in contributions received from the National Republican Congressional Committee.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within fifteen days of your receipt of this notification.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

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that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

This matter will remain 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 matter to be made public.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Scott E. Thomas
Chairman

Enclosures
Procedures

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UTAH REPUBLICAN PARTY

LARRY V. HUNT
Chairman
JUDITH W. PARKER
Vice Chairman
JACK E. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HUTT
National Committeewoman
WILBERN L. McDOUGAL
National Committeeman

GREGG M. McDONOUGH
Executive Director

April 17, 1987

87 APR 21 A10:15
RECEIVED
GENERAL COUNSEL

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

Attention: Patty Reilly

Dear Gentlemen:

This letter is in response to your letter dated 31 March 1987. You have divided your findings into 3 sections and I will address them separately.

We have recently received information from Mark Braden, Chief Counsel of the Republican National Committee that bears on the Mass Mailings referred to in finding A. Copies of this information is included as attachment A. As we interpret this information, the mailings in question do not fall under coordinated expenditures because they were done with substantial and active involvement by volunteers.

In response to the radio advertisements in finding A, the first one was prior to our having nominated a candidate. We had two men at this time running for the 2nd district and the opposition had placed major television buys in our market. We desired to educate the public concerning this non-incumbent candidate for congress. The second ad continued this education process and allowed the public to become better informed on the issues.

You included "one newspaper advertisement" in finding A, the State Party did not place any newspaper ads during the 1986 cycle. It should also be noted that late in the cycle we had a change in Treasures of the Utah Republican Party. Attachment B, is a detailed summary of expenditures for the mass amilings and the radio ads requested by Patty Reilly.

If you continue to have reason to believe that these mass mailings and radio ads fall under coordinated expenditure then we request conciliation on this matter.

643 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

Concerning finding B, if the two mass mailings fall with in the law as volunteer intensive mass mailings, then it is not necessary for the party to report them. If the radio ads are educational then the reporting was also not necessary. If you continue to have reason to believe these fall under coordinated expenditures then we request conciliation with regard to our failure to report these expenditures.

On finding C, we request that the commission, take no further action on this finding because there can be no question by the public as to who paid for the mass mailings and radio advertisements. If there is to be further action on this matter then we request conciliation.

Finally, Patty Reilly, per a phone conversation, requested a copy of authorization of coordinated expenditures to the National Republican Congressional Committee (attachment C) and a statement that assures there were no expenditures made for the President Ford visit (attachment D).

The Utah Republican Party, will be changing leadership in late June. We are very interested in taking care of this prior to that time. If there are any questions, please feel free to contact me at Republican Party headquarters - 533-9777.

Thank you for your help. We will look forward to your response.

Sincerely,

Gregg M. McDonough
Executive Director

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ATTACHMENT A

Republican National Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

April 2, 1987

TO: Republican State Chairmen

FROM: E. Mark Braden

SUBJ: VOLUNTEER ACTIVITIES/ACHIEVEMENT '88

State and local party committees have two unique advantages under the Federal Election Campaign Act (FECA).

1. Registered party committees are the only organizations which can make unlimited expenditures for volunteer activities in cooperation with, and on behalf of, Republican federal candidates; and

2. After the National Convention, only party committees can raise and spend unlimited funds for volunteer activities directly on behalf of our Presidential nominee's campaign. In contrast, following the Convention, the Presidential campaign will receive strictly limited public financing and is precluded from raising any further funds for its campaign activities.

I. The Achievement '88 Program is an effort to assist and encourage state and county committees to utilize these advantages. Achievement '88 is a party program. A state party's Achievement '88 program can be, and should be, conducted in cooperation with Republican candidates' campaigns, but must remain the party's program.

Achievement '88 volunteer activities are bound only by your committee's ingenuity and ability in raising funds and recruiting volunteers, provided certain constraints are observed:

A. Costs of such activities for federal candidate(s) are paid for from unearmarked contributions subject to limitations and restrictions of the Federal Election Campaign Act (FECA).

B. Funds received from the national party committees are not used.

II. Federal law permits three types of activity: 1. Volunteer Materials, 2. Mass Mailings, and 3. Phone Banks (Presidential).

1. Volunteer Materials. A state or local party committee may make unlimited expenditures for campaign materials; such as: buttons, bumper stickers, handbills, brochures, posters, tabloids, yard signs, etc., for use in connection with volunteer activity. These campaign materials may be prepared on behalf of any of the party's nominees and in total coordination with their campaigns. These exempt volunteer materials, however, do not include advertising using radio, TV, billboards, or newspapers.

2. Mass Mailings. State and local party committees may make mass mailings, but not direct mail of volunteer campaign materials without the cost of the materials or mailing being considered a contribution to, or an expenditure for, any federal candidate.

Direct mail means mailing by commercial vendors or from leased or purchased commercial lists. Mass mailings are mailings by volunteers from non-commercial lists. Lists obtained from public offices, such as voter registration lists, are not commercial lists. Mass mailings by party committees from lists developed by the state and local party are not direct mail. Examples of lists developed by political parties are:

a. Lists of contributors to the party,
b. Lists of volunteers who have worked for the party, and/or
c. Any list developed as a result of substantial volunteer activity on behalf of a party committee.

In order to qualify as a mass mailing, a substantial volunteer effort must be present. Volunteers must play an active and substantial role in these mailings by performing such functions as stuffing envelopes, sorting envelopes by zip code, and perhaps even licking stamps. The mere depositing of mail bags by volunteers at the post office is not substantial volunteer effort. Commercial vendors may print the letters and the envelopes without affecting the volunteer character of the mailing.

Party organizations may prepare materials in total cooperation with the Presidential or other candidates' campaigns; i.e., similar graphics, language, etc. The State Committee may use its non-profit bulk mailing rate for substantial postage savings in mailing these materials.

3. Phone Banks. State, county, and local party committees may have a volunteer Achievement '88, voter identification (ID), or get-out-the-vote (GOTV) phone bank specifically on behalf of the Presidential campaign.

The costs incurred by state and local parties in using phone banks specifically for the Presidential campaign are not contributions to, or expenditures for, his campaign when the phone banks are operated by volunteer workers. Furthermore, providing travel, subsistence, or token payments to volunteers does not alter their volunteer status. Payments incurred by state and local parties in the use of paid professionals to design the phone bank system, develop calling instructions, or train supervisors, are also not contributions and do not alter the volunteer nature of a phone bank.

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The use of the phone bank must be predominantly for the Presidential campaign. Any reference to a candidate for the House or Senate must be incidental to the overall phone bank activity; otherwise, the cost that is attributable to a Congressional candidate is considered a contribution to that candidate. Clearly, a reference to a Congressional or Senatorial candidate is incidental only if it is not a predominant purpose or substance of the phone call. Of course, a Congressional, Senatorial, or other campaign may participate fully in a phone bank by sharing in its costs.

III. Hard/Soft Dollars. A state party's voter registration, absentee balloting, ballot integrity, GOTV activities, list development, or general administrative expenses in a federal election year, even if they are not expressly for a specific federal candidate, are activities which are intended to influence an individual's decision to vote for all federal and state candidates of the party. For this reason, even if no reference is made to any federal candidacies, campaign material, phone banks, or general administrative overhead of state party committees cannot be funded exclusively from funds raised outside the restrictions of the FECA. Federal Election Commission (FEC) regulations require that a party committee be able to prove, by reasonable accounting procedure, that a percentage of its program's costs has been paid for from funds raised under the limitations and restrictions of the FECA (hard dollars).

As an example, a political party's expenditures for GOTV or registration campaigns, which are simply based upon party IDs, must be allocated on a reasonable basis between the two classes of candidates (state and federal) which would appear on that state or county elective ballot. The percentage of the phone bank or registration effort costs reasonably allocable to federal candidates must be paid from funds raised under the FECA restrictions (hard dollars). The rest can be paid with soft dollars.

Funds transferred from the national party committees, either federal or non-federal dollars, cannot be used to pay for federal non-allocable volunteer activities, but transfers from the national committees can be used to assist state and local party organizations in generating their own resources for such activities. Also, national party funds, both federal and non-federal dollars, can be used to assist in the payment of the general administrative costs of party organizations to permit them to direct more of their local federal account resources to non-allocable activities directly on behalf of specific federal candidates.

IV. Reporting. Even when a state party's non-allocable program is conducted correctly, incorrect or imprecise reporting can trigger an FEC audit or review of otherwise permissible activities. Be accurate in identifying non-allocable expenditures. For example, expenditures for mass mailings of volunteer materials should not be identified on a report as "direct mail" since costs for direct mail would be considered a contribution to, or an expenditure for, a federal candidate. Likewise, the costs of posters, yard signs, and the like should not be reported with expenditures for billboards since the costs of billboards, like radio and television, would be allocable expenditures.

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Be clear in identifying the transactions of various state funds. Even if a party committee is careful about the sources of monies used to pay for non-allocable federal activities, accidental misreporting can invite audit. For example, one state party mistakenly reported that funds received from the RNC were applied to non-allocable activities, when the funds were actually placed in another account.

Finally, be timely in filing all reports. The pressure of an upcoming deadline in the heat of a political campaign may seem onerous, but it is less so than an audit or fine. Always file your report in a timely manner, even if you must amend it if additional information comes to your attention.

CONCLUSION

Your state or county committee can open volunteer Achievement '88 party headquarters for the election of our Presidential nominee and the remainder of the Republican ticket making it the firm base for the grass roots/ volunteer ingredient of the campaign. The law makes your Achievement '88 Party Committee the logical focal point of state and local campaign efforts.

If you have any additional questions, please do not hesitate to contact this office.

EMB:jd

0004076574

Republican National Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

April 2, 1987

TO: Republican State Chairmen

FROM: E. Mark Braden EMB

SUBJ: OUTLINE OF CAMPAIGN FINANCING LAW

Following is a very brief outline of the Federal Election Campaign Act (FECA) and other important campaign financing considerations.

I. Individuals may contribute to committees or candidates as follows:

A. To federal candidates - $1,000 per election (election means any primary or general election).

B. To the RNC - $20,000 per year. An individual may contribute an unlimited amount to the RNC Building Fund or the Republican National State Elections Committee.

C. To any other federal committee (PACs, State Party, County Party Committees) - $5,000 per year.

D. An individual may not contribute more than $25,000 per calendar year to all federal candidates and committees.

E. An individual may contribute an unlimited amount, unless state law is contra, to state and local candidates or the state account of a state or county party.

II. Republican National Committee

A. Contributions to:

1. U.S. House - $5,000 per election. National Republican Congressional Committee (NRCC) may contribute an additional $5,000 per election.

2. U.S. Senate - RNC, together with the National Republican Senatorial Committee (NRSC) - combined total $17,500 for entire campaign period.

B. Expenditures (general election only) for:

1. U.S. House - $10,000 plus cost-of-living increase (1987 - $22,230). RNC shares single expenditure limit with NRCC.

2. U.S. Senate - $ .02 x State's Voting Age Population, plus cost-of-living increase. RNC shares single expenditure limit with NRSC.

3. Presidential and Vice Presidential nominees - $ .02 x Estimated Voting Age Population, plus cost-of-living increase (1984 - 6.9 million).

C. Financial support to states and local candidates is unlimited unless state law is contra.

III. State Party

A. Contribution to:

1. U.S. Senate and House candidates - $5,000 per election.

2. Presidential and Vice Presidential nominee - none.

B. Expenditures (general election only) for:

1. U.S. House - $10,000 plus cost-of-living increase (1987 - $22,230).

2. U.S. Senate - $ .02 x State's Voting Age Population, plus cost-of-living increase.

3. Presidential and Vice Presidential nominees - none.

C. Generic Republican Activities (including slate cards) - no limit.

D. Financial support to state and local candidates is unlimited unless state law is contra.

IV. County/Local Party Committees

A. Contributions to:

U.S. Senate and House candidates

a. Unaffiliated with state committee

0004076

1) Multi-candidate - $5,000 per election.

2) Non Multi-candidate - $1,000 per election.

b. Affiliated with state committee - shares single limit with state party.

B. Generic Republican Activities (including slate cards) - no limit.

C. Financial support to state and local candidates is unlimited unless state law is contra.

V. Unlimited Volunteer Party Expenditures (Commitment '80/ Victory '84/ Achievement '86/ Achievement '88.

State and local party committees may engage in certain activities that benefit federal candidates but are exempt from the definition of contribution or expenditure. A state or local party committee may make unlimited expenditures for campaign materials, such as pens, buttons, bumper stickers, posters, yard signs, mass mailings, etc., used in connection with volunteer activity. The campaign materials are to be distributed by volunteers, not by commercial organizations. Campaign materials may not include print or broadcast media, direct mail, billboards or other types of general public political advertising.

In 1988, state and local party committees may also have a volunteer voter registration or get-out-the-vote phone bank specifically on behalf of the Presidential or Vice Presidential nominees without the expenditures for the phone bank counted as contributions to the Presidential campaign.

The activities described above must be financed by unearmarked funds raised under the limitations of the FECA. In addition, payments for these activities may not be made from funds donated by the national party committee.

VI. Prohibitions.

A. Corporate contributions to federal candidates.

B. Contributions by non-U.S. citizens.

C. Receipt of contributions or solicitations on federal property.

D. Cash contributions of more than $100.00.

E. All party and candidate committees are prohibited from making independent expenditures -- no coordination or cooperation with anyone making independent expenditures.

EMB:jd

0004026577

ATTACHMENT B

MASS MAILINGS: (Stamped and handled by volunteers)

First Mailing:

77,211 pieces	
Printing	$4,911.55
Labeling	772.11
Postage	3,783.34
TOTAL	$9,467.00

Second Mailing:

118,933 pieces	
Printing	$7,957.15
Labeling	1,214.33
Postage	5,827.72
TOTAL	$14,999.20

RADIO ADVERTISEMENTS

Pre-Primary ad:	$5,337.45
Second Ad:	$5,232.90

C00407678

UTAH REPUBLICAN PARTY

[redacted]

ATTACHMENT C

September 15, 1986

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, S. E.
Washington, D. C. 20003

Dear Congressman Vander Jagt:

By this letter the Utah Republican State Party authorizes the National Republican Congressional Committee to serve as the agent of the Utah Republican Party for the purpose of making coordinated expenditures pursuant to 2 U.S.C. 441a (d) (3).

Your Committee is authorized to make these expenditures on behalf of the Utah Republican Party in connection with the general election campaign of Tom Shimizu, 2nd Congressional District.

Under 441a (d) (3) you may spend, on behalf of the Utah Republican Party, $21,000.00 for Tom Shimizu.

Sincerely,

Larry N. Lunt

543 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

ATTACHMENT D

STATEMENT

This statement is to assure that there were no expenditures made by the Utah Republican Party for or in behalf of the President Ford visit.

Signed Gregg M. McDonough Dated 4/20/87

Gregg M. McDonough
Executive Director

9004078265 80

GCC 3197

Tom SHIMIZU
FOR CONGRESS
P.O. Box 21084
Salt Lake City, Utah 84121
~~(801) 328-0160~~

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
87 APR 24 P2:47

April 14, 1987

87 APR 23 P4:41
RECEIVED
FEC
SECRETARY

Scott E. Thomas
Chairman, Federal Election Commission
Washington, D.C., 20463

Re: MUR 2288

Dear Mr. Thomas,

Thank you for your letter dated March 31, 1987, which I received on Friday, April 10th.

In response to your specific allegations regarding the failure of the Shimizu for Congress Committee to report $10,000 in contributions received from the National Republican Congressional Committee, I would like to refer you to the F.E.C. report and the "Amended" F.E.C. report covering the period from 7-31-86 through 9-30-86, which was sent to the F.E.C. on 10-15-86 and 12-9-86, respectively. The $10,000 was reported on Schedule A, Itemized Receipts (copies enclosed.) Each check from the National Republican Congressional Committee was earmarked for "Convention" and "Primary" debt retirement (copies enclosed.)

I hope this material will clarify our problem.

Sincerely,

K. Helen Oniki

(Mrs.) K. Helen Oniki
(A non-professional, volunteer worker)

Paid for by the Shimizu for Congress Committee

SCHEDULE A — ITEMIZED RECEIPTS — Page 1 of 1 for Line Number 11b

Full Name of Committee: **Shimizu for Congress Committee #118818**

A. Full Name, Address, Zip	Employer/Occupation		P/G	Date	Receipts
Nat'l Repub Cong Comm 320 1st St.,S.E.,Rm 307, Washington, DC 20003		(kind)	g	09/19/86	30.41
			Con. g	09/06/86	5000.00
			P g	09/06/86	5000.00
		(kind)	g	09/02/86	21.01
	Total YTD: $10051.42				

TOTAL THIS PAGE: 10051.42
GRAND TOTAL: 10051.42

90040786282

(Amended Report) MUR 2288

SCHEDULE A — ITEMIZED RECEIPTS

Use appropriate schedule(s) for each category of the Detailed Summary Page

PAGE OF

FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)

Shimizu for Congress Committee #118818

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Nat'l. Repub. Congressional Com. 320 1st St., S.E., Room 307 Washington, D.C., 20003 Receipt For: ☐ Primary ☐ General ☒ Other (specify): Convention	Debt retirement Occupation Aggregate Year-to-Date > $ 5000.00	9-6-86	5000.00
B. Full Name, Mailing Address and ZIP Code Nat'l. Repub. Congressional Com. 320 1st St., S.E., Room 307 Washington, D.C., 20003 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Debt retirement Occupation Aggregate Year-to-Date > $ 10000.00	9-6-86	5000.00
C. Full Name, Mailing Address and ZIP Code Nat'l. Repub. Congressional Com. 320 1st St., S.E., Room 307 Washington, D.C., 20003 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	In-kind Occupation Aggregate Year-to-Date > $ 10021.01	9-2-86	21.01
D. Full Name, Mailing Address and ZIP Code Nat'l. Repub. Congressional Com. 320 1st St., S.E., Room 307 Washington, D.C., 20003 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	In-kind Occupation Aggregate Year-to-Date > $ 10051.42	9-19-86	30.41
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	10051.42

90040076263

MUR 2288

VENDOR NUMBER
SHIM001

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

CHECK NUMBER
0A-033428

INVOICE DATE	INVOICE NO.	BATCH - VOUCHER	GROSS AMOUNT	DISCOUNT AMT.	NET AMOUNT
08/27/86	17-103 CONVENTION DEBT	00858-00003 RETIREMENT	5,000.00	.00	5,000.00
DETACH AND RETAIN STATEMENT		TOTALS ▶	5,000.00	.00	5,000.00

14407026284

VENDOR NUMBER
01-SHIM001

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

CHECK NUMBER
0A-033413

INVOICE DATE	INVOICE NO.	BATCH - VOUCHER	GROSS AMOUNT	DISCOUNT AMT.	NET AMOUNT
08/26/86	17-102 DEBT RETIREMENT	00851 00001 (PRIMARY)	5,000.00	.00	5,000.00
DETACH AND RETAIN STATEMENT		TOTALS ▶	5,000.00	.00	5,000.00

GCC3460

RECEIVED BY THE FEC
HAND DELIVERED
87 MAY 27 A 9:58

UTAH REPUBLICAN PARTY

LARRY V. LUNT
Chairman
JUDITH W. PARKER
Vice Chairman
JACK E. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HULL
National Committeewoman
WILBERN L. McDOUGAL
National Committeeman

GREGG M. McDONOUGH
Executive Director

May 26, 1987

87 MAY 27 PM 2:42

RECEIVED
GENERAL COUNSEL

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

Attention: Patty Reilly

Dear Ms. Reilly:

According to our conversation on the phone, you needed answers to three specific questions. First, what mailing list was used? Second, how many volunteers were involved in this project? Third, what activity did the volunteers perform?

First, the mailing list was solely developed by the State Republican Party and the local Salt Lake County Republican Party over the last four years. The list is one of registered voters in Salt Lake County and voter identification history that has been input with volunteer help in regards to phone numbers and political affiliation (we do not register by party in Utah). The base list was purchased 4 years ago from the Salt Lake County Clerks office and then placed on our computers for development.

Second, there were 240 volunteers which handled these mailing projects (see attached list). As pointed out in our earlier correspondence there were 196,144 total pieces of mail handled by these volunteers. On the average, this means approximately 818 pieces of mail were handled by each volunteer. If necessary, signed statements could be sought concerning the involvement of these volunteers in this project.

Third, the volunteers handled each piece of mail individually by stamping our non-profit organization mail permit up in the right hand corner of the mail piece. The piece was then bundled ready for labeling from the above mentioned party developed list.

These mass mailings were carefully regulated to make sure they were complying with Federal Election Law. I felt that there was a massive amount of volunteer hours put in on these projects. Our volunteers all felt strongly about their commitment of their time in this regard.

645 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

I do hope that your questions have been answered. Thank you for your consideration in this matter.

Sincerely,

Gregg M. McDonough
Executive Director

0 0 4 0 7 3 2 6 3 0

MASTER--3 RECORDS = 235 11-11-1986 13:47:44 PAGE: 1
SELECTION: CODEA = "V"

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Christine Ackerson	4055 Stillwater Way	West Valley City	UT	84120	( ) 967-6403	( ) -
Fran Akimo	2564 South 8th East	Salt Lake City	UT	84106	( ) 486-0519	( ) -
Kristen Anderson	1618 Foothill Dr. #622	Salt Lake City	UT	84108	( ) 583-6313	( ) -
Neil Anderson					( ) 969-1431	( ) -
Brad Baird					( ) 530-2877	( ) -
Carolyn Barney	5 Northridge Way				( ) 572-4269	( ) -
Hermione Bayas	1117 Alpine Place	Salt Lake City	UT	84105	( ) 581-9608	( ) -
DeNise Beam					( ) 264-5731	( ) 572-1428
Mike Beauchaine					( ) 2[illegible]-[illegible]707	( ) -
Bill Bellamie	6870 Bello Ave.	West Valley City	UT	84120	( ) 25[illegible]-[illegible]280	( ) -
Ariel and Irene Benson	5190 Moormont Dr.	Salt Lake City	UT	84117	( ) 278-1168	( ) -
Alice Bigelow					( ) 966-5471	( ) -
Lila Bjorklund	791 9th Ave				( ) 364-4153	( ) -
Patti Black	865 Sir Michael	Salt Lake City	UT	84116	( ) 596-3337	( ) -
Virginia Black					( ) 277-6549	( ) -
June Blatter					( ) 466-3495	( ) 530-1845
Susan Bourne	621 11th Ave	Salt Lake City	UT	84111	( ) 521-8016	( ) -
Charlton Bowen					( ) 561-8961	( ) -
Ted Boyer					( ) 943-8097	( ) 322-2516
Bob and Myrna Bray					( ) -	( ) -
Mona Bray					( ) 973-8093	( ) -
Betty Breese		Salt Lake City	UT	84122	( ) 571-2133	( ) -
Kathleen Brimley	S.L. International Center	Salt Lake City	UT	84122	( ) 250-9706	( ) -
Annette Brinton	303 East 7200 South	Midvale	UT	84047	( ) 255-3740	( ) -
Don Brytus					( ) 967-0428	( ) -
Marcie Bullock	660 South 2nd East	Salt Lake City	UT	84111	( ) -	( ) -
Marilyn Butler					( ) 943-4080	( ) -
Vaughn Butler					( ) 943-4080	( ) -
Perl Buxton					( ) 943-3681	( ) -
Adrienne Cannon					( ) 969-5649	( ) -
Marvin Carwin					( ) 268-1410	( ) -
Earl Chandrill		Sandy	UT	84070	( ) 471-5481	( ) -
Gary Chipman	1434 Chancellor Way	Salt Lake City	UT	84108	( ) 583-0937	( ) -
Alicia Christensen	2833 Comanche Dr.				( ) 581-0569	( ) -
Beulah Christensen	2121 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Chad Christensen	8754 South 1060 East	Sandy	UT	84092	( ) 562-4567	( ) -
LaMar Christensen	3121 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Mark Christensen	390 East 5900 South	Murray	UT	84107	( ) 263-1948	( ) -
Ray Christensen	50 South Main, Suite 900	Salt Lake City	UT	84144	( ) 521-5800	( ) -
Florence Covey					( ) 364-7666	( ) -
Scott Cowley	356 North 200 East #2	Provo	UT	84601	( ) 373-3326	( ) -
Alicia Crockett	1410 East 8085 South				( ) 561-3786	( ) -
Aaron Cummings	1990 McClelland St. #2				( ) 485-0866	( ) -
Ian Cummings	1134 Herbert				( ) 583-1031	( ) -
Jim Curtis					( ) 566-3266	( ) -
Lorainne Cutler					( ) 943-5428	( ) -
Alta Davis					( ) 583-8092	( ) -
Kathy Densmore	1509 Foothill	Salt Lake City	UT	84108	( ) 524-5933	( ) -
Joyce Despain	907 Conner Street	Salt Lake City	UT	84108	( ) 582-0864	( ) -
Shirley Draney					( ) 572-7575	( ) -

MASTER--3 RECORDS = 235 11-11-1986 13:47:54 PAGE: 2
SELECTION: CODEA = "V"

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Linda Draper	1672 East Success Lane	Sandy	UT	84092	( ) 571-5760	( ) -
Bryce Duckworth					( ) 571-1347	( ) -
Nona Dyer	1672 East Success Lane	Sandy	UT	84092	( ) 571-5760	( ) -
Alisa Faber	1434 East 8020 South				( ) -	( ) -
Tione Findie	751 East 500 South				( ) 322-0901	( ) -
Luella Finlinson	776 East Vine St.				( ) 266-6914	( ) -
Paul Fisher					( ) 250-5769	( ) -
Hal Foster	6350 South 440 East				( ) 268-0635	( ) -
Chris Fox	993 Lincoln St.				( ) 521-7278	( ) -
Linda Fox					( ) 942-3767	( ) -
Jackie Freeburn					( ) 566-9140	( ) -
Grace Funk					( ) 942-3767	( ) -
Josie Gomez	2890 Manzano Dr.				( ) 562-2767	( ) -
Laura Graham					( ) 295-4829	( ) -
Reg Grane					( ) 943-5339	( ) -
Clayton and Sharon Green	220 EAst Pioneer Ave	Sandy	UT	84092	( ) 255-2790	( ) -
Rochelle Green	5712 West 3980 South	West Valley City	UT	84120	( ) 968-2042	( ) -
Stephanie Griffin	927 South 1100 East	Salt Lake City	UT	84105	( ) 583-1206	( ) -
Kris Grogen	2542 South 450 East	Bountiful	UT	84010	( ) 295-8280	( ) -
Kris Grosgean	2542 South 450 East	Bountiful	UT		( ) 295-8280	( ) -
Wells Grover	3463 South 1360 East	Salt Lake City	UT	84106	( ) 485-2886	( ) -
Suzanne Gustin					( ) 583-2305	( ) -
Eleanor Hall	7234 South 2825 East	Salt Lake City	UT	84121	( ) -	( ) -
H W. Hall	7234 South 2825 East	Salt Lake City	UT	84121	( ) -	( ) -
Marilyn Hansen	4847 South 1735 East, #36	Salt Lake City	UT	84117	( ) -	( ) -
Alan Hardman					( ) 359-6869	( ) 328-4259
Jane Hardy					( ) 581-0719	( ) -
Bill Harman	86 Northridge Way	Sandy	UT	84092	( ) 571-6441	( ) 263-2354
Nadine Harmon	708 Pueblo Street				( ) 521-2489	( ) -
Sue Harry	3800 South 3020 East	Salt Lake City	UT	84109	( ) 278-2587	( ) -
Kristi Haslam	875 South 1330 East				( ) 566-0896	( ) -
Floyd Garn Hatch	2011 Bryan Avenue	Salt Lake City	UT	84108	( ) 581-1073	( ) -
Linda Hayes	7226 South 2870 East	Salt Lake City	UT	84121	( ) 943-6225	( ) -
Laurie Healy					( ) 486-2482	( ) -
Melanie Heaps	1473 East 8020 South				( ) -	( ) -
Victer Heath					( ) 561-3414	( ) 484-4221
Gordon Hegewald	Sigma Chi House				( ) 277-3867	( ) -
Carolyn Herbert	2809 Wilshire Drive	Salt Lake City	UT	84109	( ) 467-0568	( ) -
Jeremiah Hermansen	2315 Sheridan Rd	Salt Lake City	UT	84108	( ) 583-7041	( ) -
Justin Hermansen	2315 Sheridan Rd	Salt Lake City	UT	84108	( ) 583-7041	( ) -
Lynn Hill					( ) -	( ) -
Marilyn Hillstead					( ) 486-9273	( ) -
Susan Holmes					( ) 524-4394	( ) -
Jennifer Howes	8954 South Capella	Sandy	UT	84092	( ) 561-3414	( ) -
Julie Jones					( ) 583-3211	( ) -
Jeanne Jackman	2610 West 10950 South				( ) 254-4525	( ) -
Tess Jackman					( ) 255-5730	( ) -
Jerrell James	1456 Anthony Cir	Salt Lake City	UT	84104	( ) 972-4468	( ) -
Jerrell James					( ) 972-4468	( ) 969-3456
Cal Jenkins					( ) 277-6358	( ) 487-4939

MASTER--3 RECORDS = 235 11-11-1986 13:48:03 PAGE: 3
SELECTION:.CODEA = 'Y'

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Joy Jensen					( ) 364-2099	( ) -
Helen Jeppson	5508 South Chaparral Dr.	Murray	UT	84107	( ) 268-2362	( ) -
Tonya Jerry	8816 South 1595 East	Sandy	UT	84092	( ) 561-0956	( ) -
Eric Johnson	8549 Mesa Dr.	Sandy	UT	84092	( ) 561-3628	( ) -
Gaylene Johnson	1252 East Keith Dr	Sandy	UT	84070	( ) 562-4597	( ) -
Heather Johnson	8043 South 1330 East				( ) 255-5951	( ) -
Kenneth Johnson					( ) 266-1960	( ) -
Lesa Johnson					( ) 364-3381	( ) -
Lynndell Johnson					( ) 487-2348	( ) -
Cindy Jorgensen					( ) 466-3495	( ) -
Doris Jorgensen	2129 East Lawnsdale Dr.	Salt Lake City	UT	84121	( ) 942-1519	( ) -
Mary Lou Judd	125 West Harris	Salt Lake City	UT	84115	( ) 467-1923	( ) -
Lisa Kalm					( ) 272-2270	( ) -
Heidi Kammerath	1380 East 8020 South				( ) 561-4648	( ) -
Karolynn Kemple	5986 Dixie Drive	West Valley City	UT	84120	( ) -	( ) -
Blair Kent					( ) 295-7114	( ) -
Eddie Kent					( ) 295-7114	( ) -
Trish Kent					( ) 295-7114	( ) -
Ron Kidd	419 East 10450 South	Sandy	UT	84070	( ) 572-5508	( ) -
JoAnn Wong Kilpatrick	766 East Third South	Salt Lake City	UT	84102	( ) -	( ) -
Bud Knowlton	1388 Roxbury Rd	Salt Lake City	UT	84108	( ) 582-9904	( ) -
Kristen Kobogash					( ) 972-1729	( ) -
Heath Koch	1959 Falcon View Dr.				( ) -	( ) -
Joan Lamont					( ) 481-4842	( ) -
Ken Lantis					( ) 268-9674	( ) -
Jessica Larson	1389 Michigan Ave				( ) 583-0822	( ) -
Doug Lecheminant	155 N Canyon Rd #12C	Salt Lake City	UT	84103	( ) 364-2903	( ) -
Glenda Lehmkuhl					( ) 943-6428	( ) -
Ryan Leuce	1380 Chancellor Drive	Salt Lake City	UT	84108	( ) 581-9617	( ) -
Bunny Lewis					( ) 466-8833	( ) -
Myrle Lowe					( ) 483-0499	( ) -
Paula and Tom Lukow					( ) 364-7395	( ) -
Gary Lyman					( ) 485-1123	( ) -
Cherie Lyon	1700 Oak Lane				( ) -	( ) -
Melita Malloy					( ) 268-2235	( ) -
Aaron Mansell	9997 Aplomada				( ) -	( ) -
Scott Mayeda					( ) 359-6516	( ) -
Michael Lee McCarroll					( ) 364-0333	( ) -
Casey McDonough	1000 South 900 Est				( ) 364-0588	( ) -
Diane McIver					( ) 942-5460	( ) -
Neva Mitchell	7304 South 2825 East				( ) -	( ) -
Brent Montgomery					( ) 278-9949	( ) -
Clara Morris	2283 Tara Lane #3	Salt Lake City	UT	84117	( ) 272-7810	( ) -
Mortensen					( ) 533-7751	( ) -
Valerie Musgrove					( ) 524-4394	( ) -
Ellie Mutt	1207 East South Temple	Salt Lake City	UT	84103	( ) 328-1207	( ) -
Jeff Nakashima	1439 Colony Dr.	Salt Lake City	UT	84117	( ) 278-6717	( ) 322-1205
Russ Neilan					( ) 466-3605	( ) -
Russ Neilay	263 Wilson				( ) 466-3605	( ) -
Dorothea Neilson	1375 Westminster				( ) 486-0404	( ) -

MASTER--3 RECORDS = 235 11-11-1986 13:48:14 PAGE: 4
SELECTION: CODE4 = 'V'

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Thea Neilson	1375 Westminster				( ) 486-0404	( ) -
Andrew Nelson	2627 Sherwood Dr.	Salt Lake City	UT	84108	( ) 582-7393	( ) -
Sharon Nicoles	1628 Lake St.				( ) -	( ) -
Rick Norris					( ) 943-5126	( ) -
Sam Norris	1520 Canterbury Dr.	Salt Lake City	UT	84108	( ) 582-7616	( ) -
Ken Okazaki					( ) 532-6534	( ) -
Devon Olsen					( ) 582-4398	( ) -
Jeff Olsen	8204 West 33205 South	Magna	UT	84044	( ) 250-5474	( ) -
Vickie Olsen	1388 Granada Dr.	Sandy	UT	84092	( ) 571-5046	( ) -
Sue Ellen Oniki	1859 Cottonwood Club	Salt Lake City	UT	84117	( ) 277-9855	( ) -
Rikard Osthed	1974 East Falcon View Dr				( ) 571-9139	( ) -
John Pearce	3525 South 6935 West	West Valley City	UT	84120	( ) 250-5899	( ) -
Beth Poindexter	447 Wilford Ave	Murray	UT	84107	( ) 268-0167	( ) -
Steve Poulton					( ) 467-0244	( ) 486-7535
Roberta Rasmussen	1222 West Wasatch Ave.				( ) 322-5050	( ) -
Allison Reber	1430 East 8020 South	Sandy	UT	84092	( ) 562-2326	( ) -
Janet Reber	1430 EAst 8020 South	Sandy	UT	84092	( ) 561-2326	( ) -
Michelle Reber	1430 East 8020 South	Sandy	UT	84092	( ) 561-2326	( ) -
Jim Reynolds	1611 South West Temple				( ) 486-6743	( ) -
Raquel Rickenvach	7885 Manzano r.				( ) 561-3233	( ) -
Robert Roberts	4187 Holloway Dr.	Holladay	UT	84124	( ) 278-0066	( ) -
Jimmy Rodriguez	P.O. Box 404	Sandy	UT	84091	( ) -	( ) -
Joan Rowe					( ) 943-6876	( ) -
Susan Schildmeyer					( ) 571-9450	( ) -
May-Cathleen Schmidt					( ) -	( ) -
Stacey Schultz	103 East 7060 South	Midvale	UT	84047	( ) 561-4679	( ) -
Linda Scott					( ) 262-4356	( ) -
Leland Senesac					( ) 377-4431	( ) -
Kim Shelly					( ) 942-0544	( ) -
Ned Shimizu	6362 S Pawnee	Salt Lake City	UT	84118	( ) 966-8031	( ) 483-6233
Ned Shimizu					( ) 595-6184	( ) -
Kimberly Shoell					( ) 942-1434	( ) -
Michael Shurtlett					( ) 966-4369	( ) -
Cathie Simmon					( ) 467-2493	( ) -
Wesley Sine					( ) 364-5125	( ) 328-3307
Coris Skinner					( ) 255-5345	( ) -
Phil Skolmiski					( ) 561-2042	( ) -
Connie Snow	2565 East 2100 South				( ) 467-3390	( ) 524-5933
Janis Stanley					( ) 363-3392	( ) -
Sylvia Suglham					( ) 572-4304	( ) -
Paul Summer	2336 West Heather Glen Dr.	West Valley	UT	84119	( ) 969-3256	( ) -
Cathy Summons	2817 Glen Oaks	Salt Lake City	UT	84109	( ) -	( ) -
Mary Takemiri	170 Pioneer	Midvale	UT	84047	( ) 255-7756	( ) -
Amy Tamita	2533 South 5th East	Salt Lake City	UT	84106	( ) 467-3913	( ) -
Nona Tanner	2932 Kentucky Ave				( ) 278-5551	( ) -
Big Tatcher					( ) 272-2741	( ) -
Doree Tateoka	9860 South 2700 West	Riverton	UT	84065	( ) 265-1428	( ) -
Ida Tateoka	9860 South 2700 West	Riverton	UT	84065	( ) 254-4465	( ) -
Mark Tateoka					( ) -	( ) -
Rud Tateoka	5645 South Nations Way	Salt Lake City	UT	84117	( ) 278-7294	( ) -

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Neil Taylor	7960 Bridgton				( ) 250-6367	( ) -
Karen Teuscher	2430 1/2 Lambourne Ave				( ) 485-0866	( ) -
Jeff Thomas	10017 South Falcon View Dr.				( ) 571-7299	( ) -
Bot Thorop					( ) 582-4197	( ) -
Winks Tilby					( ) 943-0515	( ) -
Doug Toggaert					( ) 531-7979	( ) -
David Tyler	8445 South 1380 Est				( ) -	( ) -
Laura Tyler	8445 South 1380 East				( ) -	( ) -
Magen Tyler	8445 South 1380 East				( ) -	( ) -
Sherilyn Tyler	8445 South 1380 East				( ) 255-5673	( ) -
Jennifer Tyrrell	553 3rd Avenue				( ) 328-8599	( ) -
Tony Ushio	407 East 600 South				( ) 277-2280	( ) -
Bob Vanleperen					( ) 942-4339	( ) -
Den Walker	1324 South 1000 East				( ) 487-2260	( ) -
Max Ware					( ) 566-8975	( ) -
Robert Watson					( ) 262-6906	( ) -
Kevin Watts					( ) 277-2618	( ) -
Le Chym Wee					( ) 262-8922	( ) -
Vernon Weston					( ) 485-5705	( ) -
Bob and Linda Westover	8466 Strate Dr.	Sandy	UT	84092	( ) 561-5136	( ) -
Trent Whipple	1165 Lake Street				( ) 521-7278	( ) -
Paulene Whitehead					( ) 277-5793	( ) -
G.B. Whitney					( ) 943-9549	( ) 262-9805
Ruth Wilkinson	2905 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Peggy Williams	1621 South West Temple	Salt Lake City	UT	84101	( ) 467-7435	( ) -
Gary Wilson					( ) 359-2155	( ) -
Carolyn Winegar	9470 South 2730 East	Sandy	UT	84092	( ) 942-5057	( ) -
Joann Wong	766 East 300 South	Salt Lake City	UT	84102	( ) 363-6578	( ) -
Jeff Woodbury					( ) 485-6963	( ) -
Jayne Wyatt					( ) 278-3896	( ) -
Steven Yazi					( ) 485-6624	( ) -
Yas Yokita	10 Circle Oaks	Sandy	UT	84092	( ) 571-1709	( ) -
Frank Yoshimuri					( ) 484-6994	( ) -
Gary Zaugg	331 East Park Creeke Lane	Salt Lake City	UT	84115	( ) 487-4843	( ) -
Linda Zilner					( ) 255-7396	( ) -

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

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In the Matter of	
Shimizu for Congress Committee and K. Helen Oniki, as treasurer	MUR 2288
Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer	

SENSITIVE

EXECUTIVE SESSION
DEC 08 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("State Party") violated 2 U.S.C. § 441a(d) by exceeding the limitation on coordinated party expenditures in the 1986 House Campaign in the Second Congressional District of Utah. Additionally, the Commission determined that the State Party violated 2 U.S.C. § 441a by exceeding the Act's contribution limitations regarding these expenditures. The Commission further determined that there was reason to believe the State Party violated 2 U.S.C. § 434(b)(6)(B)(iv) by failing to report these expenditures as coordinated party expenditures, as well as found reason to believe the State Party violated 2 U.S.C. § 441d(a) by failing to place sufficient disclaimers on its communications.

Also on that date the Commission determined that there was reason to believe the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, ("Shimizu Committee") violated 2 U.S.C. § 434(b)(2) by failing to report $10,000 in contributions from the National Republican Congressional Committee ("NRCC"). The Commission further determined that there was no reason to believe the Republican National Committee and William J. McManus, as

treasurer, violated the Act. Finally, the Commission took no action at that time regarding the Office of the General Counsel's recommendation that the Commission find reason to believe the NRCC violated 2 U.S.C. § 441a(d). Respondents were notified of the Commission's determinations.[1/]

On April 24, 1987, this Office received a response from the Shimizu Committee stating that they had reported the NRCC contributions on their amended 1986 July Quarterly Report. Additionally, on April 21, 1987, this Office received a response from the State Party that included a request for pre-probable cause conciliation. After General Counsel's Office staff indicated that this Office could not recommend pre-probable cause conciliation because of a lack of information, Respondents submitted a supplemental response. As discussed below, this Office now recommends that the Commission grant this request for conciliation. Moreover, based upon additional information discovered during the investigation, as discussed at Section III F, this Office further recommends that the Commission find reason to believe the Shimizu Committee violated 2 U.S.C. § 441a(f).

II. ANALYSIS OF SHIMIZU COMMITTEE'S RESPONSE

The complaint alleged that the Shimizu Committee failed to report $10,000 in contributions from the NRCC. This Office

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1/ As discussed at Section III, this Office makes no other recommendations regarding the NRCC and considers the authorization issue resolved.

reviewed the Shimizu Committee's 1986 July Quarterly Report and determined that the Shimizu Committee had not reported contributions from the NRCC, although the NRCC had noted these contributions on its 1986 September Monthly Report. Accordingly, the Commission found reason to believe the Shimizu Committee and its treasurer violated 2 U.S.C. § 434(b)(2).

The Shimizu Committee's response to reason to believe indicates the Committee filed two amendments to its 1986 July Quarterly Report. This response also contains a copy of one of the Schedules A filed with these amendments. 2/ A review of the first of these amendments, filed on October 21, 1986, reveals that the Shimizu Committee reported four contributions from the NRCC between September 2, and 19, 1986, totalling $10,051.42, and indicated these were for the general election. The second amendment, submitted on December 12, 1986, contains the contributions in question and designates $5,000 for the primary, $5,000 for convention debt retirement and a total of $51.42 (in-kind) for the general election.3/ The second amendment also

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2/ The Shimizu Committee's First Response to reason to believe at page 2 is not an exact copy of the first amendment on the public record. The first amendment did not contain the handwritten annotations changing election designations from "g" to "Con." and "P". Copies of the Shimizu Committee's response and both amendments from the public record are attached to this report.

3/ The Commission has previously determined that because a party convention in Utah has the authority to nominate a candidate for election, such convention qualifies as an election under the Act, and thus it is afforded a separate contribution limitation. See A.O.s 1986-21 and 1978-30. In 1986 the Utah Republican Party had five potential nominees at the time of the convention and two potential nominees prior to the primary election.

includes copies of the $5000 checks from the NRCC that contained these election designations. The Shimizu Committee's reporting now conforms with that on the NRCC's reports.

Thus, it appears the Shimizu Committee initially failed to report the NRCC contributions and subsequently amended its reports prior to the filing of the complaint in this matter. Then, after receiving the complaint, the Shimizu Committee amended its 1986 July Quarterly Report to correctly report the designations of the contributions.[4/]

III. ANALYSIS OF THE STATE PARTY'S RESPONSES

A. Resolution of Initial Questions

The State Party's responses resolve two issues noted in the First General Counsel's Report in this matter. First, regarding the question whether the State Party authorized the NRCC to make coordinated party expenditures on its behalf, the State Party's First Response includes a copy of an authorization it made to the NRCC on September 15, 1986. This written authorization was made at a time when the State Party had spent $5,337.45 for radio ads, which the Commission found reason to believe were section 441a(d) expenditures (although the State Party did not believe that its expenditures had so qualified). Thus, because the NRCC had received authorization prior to making its expenditures, the NRCC is no longer considered a potential respondent in this matter.

Second, the complaint alleged that the State Party spent $10,000 for costs associated with a fundraising appearance by

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4/ The Shimizu Committee's possible acceptance of an excessive contribution is discussed at Section III F.

former President Gerald Ford. The First General Counsel's Report noted that it was unclear whether the costs of the fundraiser should be included in the coordinated party expenditures of the State Party, given the question as to whether any expenditures were made in relation to the Shimizu Campaign. The State Party asserts that no expenditures were made by it for this visit and has provided a signed statement to this effect. See Attachment Three at pages 2 and 12. Accordingly, it appears that the State Party has demonstrated it did not make any expenditures for the Ford visit.

The State Party's First Response also apparently argues that the radio ads and the mailers noted in the complaint were not subject to the limitations of Section 441a(d). Alternatively, it requests pre-probable cause conciliation in the event the Commission determines these expenditures are coordinated party expenditures. The radio ads and mailers are discussed separately below.

B. Radio Ads Aired by the State Party

An expenditure by a state party is subject to the limitation of section 441a(d) if it is made in connection with the general election, depicts a clearly identified candidate, and contains an electioneering message. Respondents apparently argue that the radio ads are not section 441a(d) expenditures because they were made prior to the primary election (and hence were not for the general election.) Additionally, Respondents dispute that the

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radio ads contained an electioneering message.

In support of their argument that the radio ads were not for the general election, Respondents assert that the Anti-Owens Ad was placed when the State Party had two candidates seeking the nomination and at a time when "the opposition had placed major television buys in our market." Attachment Three at 1. Respondents' argument that the radio ads were not Section 441a(d) expenditures because they were aired prior to the primary and at a time when the State Party lacked a nominee must fail because the Commission has determined that section 441a(d) expenditures are not necessarily restricted to the time period between nomination and election. Rather, where a candidate appears assured of a party's nomination, the general election campaign, at least from the political party's perspective, may begin prior to nomination. Advisory Opinion 1984-15; See also MUR 2186. Here, the response to the complaint noted that the State Party apparently considered Mr. Owens to be his party's nominee prior to the primary election. See First General Counsel's Report at 7. Moreover, contrary to Respondents' assertion, the Commission has not required the expending party to be certain of its own nominee. It is only necessary that the expenditures benefit the person eventually nominated by that party. See Advisory Opinion 1984-15 and MUR 2186. Therefore, because Mr. Owens was clearly identified in the ads, was considered to be his party's nominee by the State Party, and was portrayed in a manner that benefitted the eventual Republican nominee, the ads have met two of the requirements for a section 441a(d) expenditure.

Respondents also assert that the other requirement for a section 441a(d) expenditure - an electioneering message - has not

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been established. In discussing both radio ads Respondents state that the ads were an effort "to educate the public concerning this non-incumbent candidate for congress...and allowed the public to become better informed on the issues." State Party's First Response at 1. Although the State Party asserts that it aired these ads with the purpose of "educating" voters, the Ads contained electioneering messages as well. This is illustrated by the Anti-Owens Ad that noted the candidate's party affiliation and indicated he was spending $50,000 to convince voters of something suggested to be untrue. Similarly, the Village Voice Ad also suggested that the candidate was lying about his status as a conservative, thus leading to the conclusion that voters should not vote for him. In sum, the content of both ads, when read as a whole, made evident a design to create a negative impression of the candidate, and thus conveyed the message that voters should not vote for Owens, but for his opponent. This is the essence of an electioneering message. Thus, both ads are subject to section 441d(a).

The State Party's First Response indicates it spent $5,337.45 on the Anti-Owens Ad and $5,232.90 on the Village Voice Ad. The State Party's section 441a(d) limitation for the Second Congressional District of Utah was $21,810. Because, however, the State Party had authorized the NRCC to spend against its entire coordinated party expenditure limit, and the NRCC made such expenditures, the State Party no longer had a section 441a(d) expenditure limit to spend against. Consequently, the State Party's total expenditures of $10,570.35 for the radio ads,

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as coordinated party expenditures, exceeded the limitations of Section 441a(d).

C. Mass Mailings Conducted By the State Party

1. The Law

The State Party disputes the Commission's determination that two mass mailings it conducted are subject to the limitations of Section 441a(d), arguing that the mailings constituted volunteer activity that is exempt from the definition of expenditure. Pursuant to 2 U.S.C. § 431(9)(B)(viii), the definition of expenditure does not include payments by a state party of the costs of certain campaign materials used by such committee in connection with volunteer activities on behalf of its nominees, provided the payments are not for costs in connection with broadcasting, newspaper, magazine, billboard, direct mail, or similar type of general public communication or political advertising. Additionally, such payments by the state party must be made with permissible funds and cannot be made from contributions designated to be spent on behalf of a particular candidate.

The Commission's Regulations at 11 C.F.R. § 100.8(b)(16) provide further information regarding the application of the exemption to the definition of expenditure. In relevant part, the Regulations clarify the definition of "direct mail" to mean mailings by a commercial vendor from a commercial list. Additionally, regarding volunteer activity, the Regulations require that the materials be distributed by volunteers and not by commercial or for profit operations. Payments by the party

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organization for travel and subsistence or customary token payments to volunteers do not remove such individuals from the volunteer category.

The legislative history provides some guidance as to the congressional intent behind the volunteer exemption. The "buttons and bumper stickers" exemption was added to the Act with the 1979 amendments and originated as part of the House bill (H.R. 5010), which was subsequently enacted. The committee report accompanying H.R. 5010 discussed the parallel exemption to the definition of contribution and stated with respect to this exemption:

> (x) "Buttons and bumper stickers" etc. The purpose of this section is to encourage volunteers to work for and with local and State political party organizations. The cost of campaign materials purchased by a State or local party organization which support Federal candidates who have been nominated by a political party are not contributions to the Federal candidates if the campaign materials are used by the State or local party organization in connection with volunteer activities. To be eligible for the exemption, the campaign materials must be purchased by the State or local party committee. Campaign materials purchased by the national committee of a political party and delivered to a State or local party committee would not come within the exemption.
>
> The test for determining volunteer activities is twofold - how the campaign materials are used and by whom. The bill excludes all general public communications or political advertising. Although the bill does give examples of campaign materials which are customarily used in connection with volunteer activities, the purchase of an item on that list does not automatically mean that the cost is exempted. For example, the cost of printing a party tabloid featuring Federal candidates would be exempted if the tabloid were distributed by volunteers at a shopping

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> center or door-to-door. However, if the same tabloid were distributed by a commercial vendor, the cost of the tabloid would not be exempted. Since the purpose is to encourage volunteer participation, distribution by commercial or for-profit operations is not exempted. Payments by the party organization for travel and subsistence or customary token payments by the party organization to individuals does not, however, remove the individual from the volunteer category. (emphasis added)

See H.R. Rep. No. 422, 96th Cong., 1st Sess at 9 (1979), reprinted in FEC, Legislative History of Federal Election Campaign Act Amendments of 1979 at 193 (GPO 1983).

As noted above, Congress enacted the buttons and bumper stickers exemption to the definition of contribution to promote volunteer activity. The legislative history further states that this discussion is applicable to the similar "buttons and bumper stickers" exemption to the definition of an expenditure. Id, at 195.

2. The Facts

In the instant case, the State Party states the costs for the two mailings are not expenditures under the Act because they constitute exempt volunteer activity. The State Party asserts that the mailings were conducted "with substantial and active involvement by volunteers." State Party's First Response at 1. At the request of this Office the State Party provided further information about this volunteer activity. The State Party's second response states that 240 volunteers participated in the two mailings. The State Party notes the volunteers handled 196,144 pieces of mail, thus averaging approximately 818 pieces

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of mail per volunteer. State Party's Second Response at 1. However, the Respondents state that the volunteers only activity with respect to the mailers was to stamp the non-profit mail seal on them, after which "The piece was then bundled ready for labeling from the...party developed list." Id. Respondents note this list was purchased four years ago from the local clerk's office, with additional information added to it by the State Party. The State Party's First Response states the cost of the first mailer was $9,467 and the cost of the second was $14,999.20.

3. Application of the Law to the Facts

It is the opinion of this Office that the State Party has failed to come within the provisions for the volunteer exemption. Although Respondents have established the presence of volunteers, as noted by the legislative history, the mere presence of such volunteers is insufficient to bring the cited activity within the exemption. Rather, the use of these materials by the volunteers must be examined to determine whether the campaign materials are general public communications or political advertising.

An examination of the circumstances surrounding these mailings leads to the conclusion that the mailings essentially were a commercial operation. Respondents used a commercial printer to print the mailers. The first mailing was composed of 77,211 pieces at a cost of $4,911.55. The second mailing was composed of 118,933 pieces at a cost of $7,957.15. In addition to these commercial printing costs, the State Party also paid to have mailing labels attached, at a cost of $772.11 for the first

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mailer and $1,214 for the second mailer. The mailers were then distributed through the United States mail. The only role the volunteers played in this entire process was the stamping of the non-profit seals on the mailers. There was no volunteer distribution or other substantial volunteer involvement as envisioned by the legislative history. In fact, had Respondents used a commercial list rather than a list developed by the party, the activity clearly would have constituted "direct mail" outside the scope of the exemption. The mere use of volunteers to stamp on the seals does not turn an otherwise commercial venture into exempt activity. Accordingly, Respondents' $24,466 in expenditures for these mailings are also subject to the limitations of Section 441a(d), and when coupled with the costs of the radio ads, constitute excessive expenditures of $40,166.55. 5/

D. Reporting Problems

The Commission also determined that there was reason to believe the State Party violated 2 U.S.C. § 434(b)(6)(B)(iv) by failing to report its coordinated party expenditures. Because the radio ads and the mailers were subject to the limitations of section 441a(d), Respondents were required to report these expenditures pursuant to 2 U.S.C. § 434(b)(6)(B)(iv).

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Accordingly, an admission of this violation is included in the attached proposed conciliation agreement.

E. Disclaimer Problems

The Commission also determined that there was reason to believe the State Party failed to place a full disclaimer on the two radio ads and the two mailings by omitting the required authorization statement in violation of 2 U.S.C. § 441d. The State Party does not dispute the Commission's determination, but requests that the Commission take no further action as to these violations "because there can be no question by the public as to who paid for the mass mailing and radio advertisements." State Party's Second Response at 2.

The State Party's Response is correct in that the sources of payments were not in dispute, however, the public was unaware whether or not the candidate had authorized these expenditures. Accordingly, it is the position of this Office that this violation should be pursued. Therefore, the attached conciliation agreement addresses Respondents' failure to include appropriate disclaimers on these communications.

F. Additional Basis of Section 441a(a) Violation

The Commission's findings in this matter also encompassed a violation of section 441a. The Commission made this finding because the State Party also has a contribution limit of $5,000 for the general election. 2 U.S.C. § 441a(a)(2)(A). Thus, the Commission recognized that in the event these expenditures were

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determined not to be party-building as the State Party asserted, the State Party possibly could apply some of the expenditures against its $5,000 contribution limit, pursuant to 2 U.S.C. § 441a(a)(2)(A). Respondents have not asserted that defense with regard to the expenditures at issue.

This Office has reviewed the reports of the State Party, however, and determined that it made a $500 general election contribution to the Shimizu Committee on October 9, 1986, and a $5,000 general election contribution to the Shimizu Committee on October 27, 1986. Thus, it appears the State Party did make an excessive general election contribution. The Shimizu Committee does not appear to have reported the first $500 contribution. Because the Commission has already made a finding of reason to believe the State Party violated section 441a(a), no additional finding is necessary regarding this excessive contribution. This information is included in the attached proposed conciliation agreement. Additionally, this Office recommends that the Commission find reason to believe the Shimizu Committee violated 2 U.S.C. § 441a(f) regarding its possible receipt of this second contribution. Moreover, the Committee's failure to report the $500 contribution from the State Party is incorporated into the Commission's previous finding of a violation by the Shimizu Committee of 2 U.S.C. § 434(b)(2).

IV DISCUSSION OF CONCILIATON AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Find reason to believe the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, violated 2 U.S.C. § 441a(f).

2. Enter into conciliation prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer.

3. Approve the attached letters and proposed conciliation agreement.

11/25/87
Date

Lawrence M. Noble
General Counsel

Attachments
1. Shimizu Response
2. Shimizu First Amended Schedule A
3. Shimizu Second Amended Schedule A
4. State Party's First Response
5. State Party's Second Response
6. Proposed Conciliation Agreement
7. Proposed Letters (2)

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: DECEMBER 3, 1987

SUBJECT: OBJECTIONS TO MUR 2288 - General Counsel's Report Signed November 25, 1987

The above-captioned document was circulated to the Commission on Tuesday, December 1, 1987 at 11:00 A.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	X
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	X

This matter will be placed on the Executive Session agenda for December 8, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	
	)	MUR 2288
Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 8, 1987, do hereby certify that the Commission decided by a vote of 6-0 to defer consideration of MUR 2288 until December 10, 1987, at a continuation of the executive session.

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

Attest:

12-9-87
Date

Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	MUR 2288
	)	
Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 10, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2288:

1. Find reason to believe the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, violated 2 U.S.C. § 441a(f).

2. Reject, at this time, recommendation number 2 contained in the General Counsel's report dated November 25, 1987.

3. Direct the Office of General Counsel to send an appropriate letter and interrogatories based on the discussion held at the meeting.

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

Attest:

12-10-87
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 4, 1988

K. Helen Oniki
Shimizu for Congress Committee
P. O. Box 21084
Salt Lake City, Utah 84121

RE: MUR 2288
Shimizu for Congress Committee and K. Helen Oniki, as treasurer

Dear Ms. Oniki:

On March 31, 1987, you were notified that the Federal Election Commission found reason to believe that Shimizu for Congress Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(b)(2). On April 24, 1987, you submitted a response to the Commission's reason to believe finding in this matter.

Additionally, on December 10, 1987, the Commission found reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). Specifically, the reports of the Utah Republican Party Federal Account reported making a total of $5,500 in general election contributions to your Committee on October 9 and 27, 1986. We note the Shimizu Committee does not appear to have reported the October 9, 1986 contribution and the Commission has incorporated this failure to report this contribution as an additional basis for the reason to believe determination of a violation of 2 U.S.C. § 434(b)(2).

Under the Act you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

This matter will remain 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 matter to be made public.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Thomas J. Josefiak
Chairman

0004078271

MUR# 2288
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
88 JAN 26 PM 3:59

January 20, 1988

Thomas J. Josefiak
Chairman, Federal Election Committee
Washington, D.C., 20463

Re: MUR 2288
Shimizu for Congress Com.
and K. Helen Oniki, Treas.

Dear Mr. Josefiak,

Thank you for your letter dated January 4, 1988, which I received on Friday, January 8th.

In response to the specific allegation regarding the omission of the Shimizu for Congress Committee to report a $500.00 contribution from the Utah Republican Party, a check for $500.00, for primary debt retirement, was received and deposited on October 29, 1986. Apparently, the Finance Director and the accountant, who together prepared the FEC reports, failed to list that particular check in the "Political Party Committee" category, and instead, included it in the "Individual Unitemized" category. I have corrected the error and now include the $500.00 under "Contributions from Political Party Committees." I am sorry for this error and hope this will resolve the matter. (Reports enclosed.)

Thank you for your patience.

Sincerely,

K. Helen Oniki

(Mrs.) K. Helen Oniki
Treasurer
(A non-professional volunteer)

Please note this address change:

M. Tom Shimizu
2977 East 7000 South
Salt Lake City, Utah 84121

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 JAN 27 AM 11:23

2004078272

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(No changes on Summary top/pages) (Summary Page) (No changes on top Summary Pages)

1. Name of Committee (in Full)	2. FEC Identification Number
Shimizu for Congress Committee	118818
Address (Number and Street)	**3. Is this Report an Amendment?**
2977 East 7000 South	[X] YES [ ] NO
City, State and Zip Code [X] Check if address is different than previously reported.	
Salt Lake City, Utah 84121	

4. TYPE OF REPORT

- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [X] January 31 Year End Report
- [X] July 31 Mid Year Report (Non-election Year Only)
- [ ] Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- [ ] Thirtieth day report following the General Election on _____ in the State of _____
- [ ] Termination Report

This report contains activity for – [ ] Primary Election [X] Post-General Election [ ] Special Election [ ] Runoff Election

SUMMARY

5. Covering Period 10-16-86 through 11-24-86; 11-25-86 through 12-31-86; 1-01-87 through 6-30-87

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))		
(b) Total Contribution Refunds (from Line 20 (d))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)		
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		
8. Cash on Hand at Close of Reporting Period (from Line 27)		
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		

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

K. Helen Oniki
Type or Print Name of Treasurer

K. Helen Oniki
SIGNATURE OF TREASURER

1-20-88
Date

For further information, contact:
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

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

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

FEC FORM 3 (3/80)

C00407627 13

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (In Full)	#118818	Report Covering the Period:		
Shimizu for Congress Committee		From: 10-16-86	To: 11-24-86	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		46452.47	174862.52	11 (a)
(Memo Entry Unitemized $ 25051.47)				
(b) Political Party Committees		11300.00	28861.96	11 (b)
(c) Other Political Committees				11 (c)
(d) The Candidate				11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).				11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES				12
13. LOANS:				
(a) Made or Guaranteed by the Candidate				13 (a)
(b) All Other Loans				13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))				13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				14
15. OTHER RECEIPTS (Dividends, Interest, etc.)				15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)				16
II. DISBURSEMENTS				
17. OPERATING EXPENDITURES				17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES				18
19. LOAN REPAYMENTS:				
(a) Of Loans Made or Guaranteed by the Candidate				19 (a)
(b) Of All Other Loans				19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))				19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees				20 (a)
(b) Political Party Committees				20 (b)
(c) Other Political Committees				20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))				20 (d)
21. OTHER DISBURSEMENTS				21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)				22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$	24
25. SUBTOTAL (Add Line 23 and Line 24)	$	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$	27

C00407271

SCHEDULE A

ITEMIZED RECEIPTS

(Political Party Committees)

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

PAGE OF

FOR LINE NUMBER 11b

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

NAME OF COMMITTEE (In Full)

Shimizu for Congress Committee

(10-16-86 thru 11-24-86)
#118818

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Utah Republican Party 150 South 600 East Salt Lake City, Utah 84102 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		10-29-86	500.00 (Primary Debt Retirement)
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer / Occupation / Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	500.00
TOTAL This Period (last page this line number only)	11300.00

C00407827

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (In Full): #118818 Shimizu for Congress Committee

Report Covering the Period: From: 11-25-86 To: 12-31-86

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees		174915.52	11 (a)
(Memo Entry Unitemized $)			
(b) Political Party Committees		28861.96	11 (b)
(c) Other Political Committees			11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).			11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)			16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES			17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)			22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD . . . . . $ _____ 23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16) . . . . . $ _____ 24

25. SUBTOTAL (Add Line 23 and Line 24) . . . . . $ _____ 25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) . . . . . $ _____ 26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) $ _____ 27

C 00407716

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (In Full)	Report Covering the Period:
#118818 Shimizu for Congress Committee	From: 1-1-87 To: 6-30-87

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees		175015.52	11 (a)
(Memo Entry Unitemized $)			
(b) Political Party Committees		29088.80	11 (b)
(c) Other Political Committees			11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).			11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)			16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES			17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)			22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$	24
25. SUBTOTAL (Add Line 23 and Line 24)	$	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$	27

C00407627

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1988

Gregg M. McDonough
Utah Republican Party
643 East 400 South
Salt Lake City, Utah

RE: MUR 2288
Utah Republican Party
(Federal Account) and
R. Todd Neilson, as
treasurer

Dear Mr. McDonough:

On March 10, 1987, you were notified that the Federal Election Commission found reason to believe that the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a). On April 17, 1987, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe, and on May 27, 1987, you submitted additional information regarding this request.

The Commission has reviewed your request and determined to decline at this time to enter into conciliation prior to a finding of probable cause to believe because additional information is necessary. The enclosed interrogatories and request for production of documents requests further information. Your response should be submitted to the Office of the General Counsel within 15 days of receipt of this letter.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

0004078278

If you have any questions please contact Patty Reilly, the attorney asigned to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

20040762719

CCC#6464

UTAH REPUBLICAN PARTY

H. CRAIG MOODY
Chairman
DONNA M. DAHL
Vice Chairman
JACK F. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HULL
National Committeewoman
WILBERN L. McDOUGAL
National Committeeman

HAND DELIVERED

88 FEB 18 AM 11:05

February 17, 1988

Patty Reilly
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2288
Utah Republican Party
(Federal Account) and
R. Todd Neilson, as
treasurer

Dear Ms. Reilly:

This letter is in response to your letter dated February 4, 1988, requesting production of documents and interrogatories to provide additional information in reference to MUR 2288.

The Utah Republican Party requests an extension of time to research the matter before responding for the following reason:

> Gregg McDonough, to which the letter is addressed, and to whom the FEC has been corresponding, is no longer the Executive Director of the Utah Republican Party, and has taken employment in another state. Therefore, it is necessary that we have more time in order to assign someone to research the case and resond.

Thank you for your prompt attention to this matter. We look forward to your response.

Sincerely,

Michelle

Michelle Buchan
Office Manager

RECEIVED
FEDERAL ELECTION COMMISSION
88 FEB 18 PM 12:30

843 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 22, 1988

Michelle Buchan
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

RE: MUR 2288
Utah Republican Party
(Federal Account) and
R. Todd Neilson, as
treasurer

Dear Ms. Buchan:

The Office of the General Counsel is in receipt of your recent letter requesting an extension of time to reply to the Commission's interrogatories and request for documents in the above-captioned matter. After considering the circumstances as detailed in your request, this Office will grant a twenty day extension of time. Accordingly, the response in this matter is due no later than March 15, 1988.

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

Sincerely,

Lawrence M. Noble
General Counsel

0004076221

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

88 MAR -1 PM 1:43

In the Matter of	)	
	)	
Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer	)	MUR 2288
	)	

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #1

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("State Party") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a). On December 10, 1987, the Commission considered the State Party's request for pre-probable cause conciliation and determined that further discovery was warranted in this matter. Accordingly, the Commission directed this Office to circulate additional questions for Commission approval. The Commission approved these interrogatories on January 27, 1988, and they were sent to the State Party on February 4, 1988.

On February 18, 1988, the State Party contacted this Office and stated that its former director had left the employment of the State Party. In order to prepare responses to the interrogatories, respondents requested a twenty day extension of time. Under these circumstances, the Office of the General Counsel granted this extension and notified the respondents that a response is due no later than March 15, 1988. After receiving and evaluating this response, this Office will report to the Commission.

Date 3/1/88

Lawrence M. Noble
General Counsel

Staff Person: Patty Reilly

0004078227 2

MUR 2288
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
88 MAR 21 PM 12:26

UTAH REPUBLICAN PARTY

H. CRAIG MOODY
Chairman
DONNA M. DAHL
Vice Chairman
JACK E. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HULL
National Committeewoman
WILBERN L. McNOUGAL
National Committeeman

GREGG M. McDONOUGH
Executive Director

March 14, 1988

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAR 21 PM 3:16

Federal Election Commission
Lawrence M. Noble
General Counsel
999 E Street, N.W.
Washington, D.C. 20003

RE: MUR 2288
Utah Republican Party
(Federal Account) and
R. Todd Neilson, as
Treasurer

Dear Lawrence:

The following are answers to interrogatories propounded by the Federal Election Commission (FEC) in reference to mailer activities that the Utah Republican Party Federal Account ("the committee") conducted on behalf of the Shimizu for Congress Committee during the 1986 election cycle, which the committee has treated as being within the volunteer campaign materials exemption.

1. Dates of the volunteer mailings, (attachments A & B are copies of U. S. Postal Service Statement of Mailings)

   a. "Wayne Owens Door" mailed, 10/24/86
   b. "Tom Shimizu - the Company He Keeps" mailed, 10/24/86

2. The information pertaining to question #2 a., was obtained from:

   Arlene Ellis
   Volunteer Coordinator for Shimizu for Congress, 1986
   Homemaker, presently and since campaign.
   1496 Jamestown Drive
   Salt Lake City, UT 84121
   801-277-6882

643 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

a. Arlene Ellis states, there were 235 volunteers that worked on both mailings. (attachment C, 5 one page documents provided by Arlene Ellis) The basis for being volunteers is that they voluntarily inquired about helping with the campaign and requested to be involved and donate their time.

b. Arlene Ellis states that the volunteers were not paid.

c. Arlene Ellis states that each volunteer spent time stamping the bulk rate permit on the mailing.

Sample:



This stamp was individually applied to each piece of mail by volunteers.

Each volunteer spent approximately 36 hours per person over a 3 week period.

d. Arlene Ellis is the person responsible for supervising the volunteer activity.

Arlene Ellis
1496 Jamestown Drive
Salt Lake City, UT 84121
801-277-6882

3. a. Yes, Communications Graphics printed the "You Can Tell" mailer

b. Communications Graphics (printing company)
6209 Stratler Street
Murray, UT 84107
801-266-5757

Service: Printing
Folding
Typesetting
Art
Design & Pasteup

Paid $8,666.21
Date 11/3/86

(attachment D, is an invoice for printing and attachment E, is a check voucher.)

4. The funds for the mailings were not designated for any specific federal candidate.

C00407882724

Gregg McDonough can furnish testimony concerning this response.

Gregg McDonough
Executive Director 1984-January 1988
Presently Campaign Manager for Keith DeGreen for Senate Campaign, Phoenix, Arizona
4500 North 32nd Street, Suite 201
Phoenix, Arizona 85018
602-997-1650

5. The Utah Republican Party Federal Account ("the committee") received no funds from the National Republican Congressional Committee or the Republican National Committee during the 1986 election cycle.

Gregg McDonough can furnish testimony concerning this response.

I have supplied responses to these interrogatories to the best of my knowledge and hope that they will be helpful to this investigation.

Sincerely,

Michelle Buchan

Michelle Buchan
Office Manager

0004078225

PS Form 3602, Apr. 1985 10-0293 FOR ZONE RATED MAIL USE FORM 3605 4

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAI[illegible]mplete all items by typewriter, pen or indelible [illegible]
Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

[illegible] For Company Use Only

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece both

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category *(See DMM 128)*
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0264 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
38843	1109	39			2

Name and Address of Permit Holder *(Include ZIP Code)*

Utah State Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared *(If other than permit holder)*

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent *(If other than permit holder)*

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7. Basic	No. Qual. Pieces 38834	Rate Per Piece .071 $	Postage 2757.21
	8. Rate Category	No. of Pieces 9	Rate Per Piece .085 $	Postage .77
	9. SUBTOTAL (1 through 8) ▶			Postage 2757.98

10. Additional Postage Payment *(State reasons for additional postage payments)* — No. Pieces — Rate/Piece $ — Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. *(Form 3602-PC required)*

SALT LAKE CITY UTAH

TOTAL POSTAGE *(9 plus 10)* where applicable) ▶ Total Postage $ 2757.98

*The signature of a non-profit [illegible] certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a [illegible] with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken [illegible] on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent *(Both principal and agent are liable for any postage deficiency incurred)* — Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Postal Stamp (Required)

Signature of Weigher — Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-477-097:39210 FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

PS Form 3602, Apr. 1985 10-918A [redacted]R ZONE RATED MAIL USE FORM 3605 [redacted] Owens Door B

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAILER: Complete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, utah 84119	10-21-86		

Check applicable box

1st Class
- ☐ International
- ☐ IP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit both
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☒ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece 0284 ___ ___ ___ ___ lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
66331	1883	66			3

Name and Address of Permit Holder (Include ZIP Code)

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2039 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 66331	Rate Per Piece $ .071	Postage 4716.60
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8) ▶			Postage 4716.60
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

SALT LAKE CITY UT

TOTAL POSTAGE (9 plus 10) where applicable) ▶ Total Postage $ 4716.60

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed; and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Lynette Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time
A.M.
P.M.

--3 RECORDS = 235 11-11-1986 13:47:44 PAGE: 1
ECTION: CODEA = "V"

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Christine Ackerson	4055 Stillwater Way	West Valley City	UT	84120	( ) 967-6403	( ) -
Fran Akimo	2564 South 8th East	Salt Lake City	UT	84106	( ) 486-0519	( ) -
Kristen Anderson	1618 Foothill Dr. #622	Salt Lake City	UT	84108	( ) 583-6313	( ) -
Neil Anderson					( ) 969-1431	( ) -
Brad Baird					( ) 530-2877	( ) -
Carolyn Barney	5 Northridge Way				( ) 572-4269	( ) -
Hermione Bayas	1117 Alpine Place	Salt Lake City	UT	84105	( ) 581-9608	( ) -
DeNise Beam					( ) 264-5731	( ) 572-1428
Mike Beauchaine					( ) 261-3287	( ) -
Bill Bellamie	6870 Bello Ave.	West Valley City	UT	84120	( ) 250-5280	( ) -
Ariel and Irene Benson	5190 Moormont Dr.	Salt Lake City	UT	84117	( ) 278-1168	( ) -
Alice Bigelow					( ) 966-5471	( ) -
Lila Bjorklund	791 9th Ave				( ) 364-4153	( ) -
Patti Black	865 Sir Michael	Salt Lake City	UT	84116	( ) 596-3337	( ) -
Virginia Black					( ) 277-6549	( ) -
Jane Blatter					( ) 466-3495	( ) 530-1845
Susan Bourne	621 11th Ave	Salt Lake City	UT	84111	( ) 521-8016	( ) -
Charlton Boven					( ) 561-8961	( ) -
Ted Boyer					( ) 943-8097	( ) 322-2516
Bob and Myrna Bray					( ) -	( ) -
Myra Bray					( ) 973-8093	( ) -
Betty Breese		Salt Lake City	UT	84122	( ) 571-2133	( ) -
Kathleen Brimley	S.L. International Center	Salt Lake City	UT	84122	( ) 250-9706	( ) -
Annette Brinton	303 East 7200 South	Midvale	UT	84047	( ) 255-3740	( ) -
Don Brytus					( ) 967-0428	( ) -
Marcie Bullock	660 South 2nd East	Salt Lake City	UT	84111	( ) -	( ) -
Marilyn Butler					( ) 943-4080	( ) -
Vaughn Butler					( ) 943-4080	( ) -
Verl Buxton					( ) 943-3681	( ) -
Adrienne Cannon					( ) 969-5649	( ) -
Marvin Carwin					( ) 268-1410	( ) -
Earl Chandrill		Sandy	UT	84070	( ) 471-5481	( ) -
Gary Chipman	1434 Chancellor Way	Salt Lake City	UT	84108	( ) 583-0937	( ) -
Alicia Christensen	2833 Comanche Dr.				( ) 581-0569	( ) -
Beulah Christensen	2121 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Chad Christensen	8754 South 1060 East	Sandy	UT	84092	( ) 562-4567	( ) -
LaMar Christensen	3121 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Mark Christensen	390 East 5900 South	Murray	UT	84107	( ) 263-1948	( ) -
Ray Christensen	50 South Main, Suite 900	Salt Lake City	UT	84144	( ) 521-5800	( ) -
Florence Covey					( ) 364-7666	( ) -
Scott Cowley	356 North 200 East #2	Provo	UT	84601	( ) 373-3326	( ) -
Alicia Crockett	1410 East 8085 South				( ) 561-3786	( ) -
Aaron Cummings	1990 McClelland St. #2				( ) 485-0866	( ) -
Ian Cummings	1134 Herbert				( ) 583-1031	( ) -
Jim Curtis					( ) 566-3266	( ) -
Lorainne Cutler					( ) 943-5428	( ) -
Alta Davis					( ) 583-8092	( ) -
Kathy Densmore	1509 Foothill	Salt Lake City	UT	84108	( ) 524-5933	( ) -
Joyce Despain	907 Conner Street	Salt Lake City	UT	84108	( ) 582-0864	( ) -
Shirley Draney					( ) 572-7575	( ) -

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Linda Draper	1672 East Success Lane	Sandy	UT	84092	( ) 571-5760	( ) -
Bryce Duckworth					( ) 571-1347	( ) -
Nona Dyer	1672 East Success Lane	Sandy	UT	84092	( ) 571-5760	( ) -
Alisa Faber	1434 East 8020 South				( ) -	( ) -
Tione Findle	751 East 500 South				( ) 322-0901	( ) -
Luella Finlinson	776 East Vine St.				( ) 266-6914	( ) -
Paul Fisher					( ) 250-5769	( ) -
Hal Foster	6350 South 440 East				( ) 268-0635	( ) -
Chris Fox	993 Lincoln St.				( ) 521-7278	( ) -
Linda Fox					( ) 942-3767	( ) -
Jackie Freeburn					( ) 566-9140	( ) -
Grace Funk					( ) 942-3767	( ) -
Josie Gomez	2890 Manzano Dr.				( ) 562-2767	( ) -
Laura Graham					( ) 295-4829	( ) -
Reg Grane					( ) 943-5339	( ) -
Clayton and Sharon Green	220 EAst Pioneer Ave	Sandy	UT	84092	( ) 255-2790	( ) -
Rochelle Green	5712 West 3980 South	West Valley City	UT	84120	( ) 968-2042	( ) -
Stephanie Griffin	927 South 1100 East	Salt Lake City	UT	84105	( ) 583-1206	( ) -
Kris Grogen	2542 South 450 East	Bountiful	UT	84010	( ) 295-8280	( ) -
Kris Grosgean	2542 South 450 East	Bountiful	UT		( ) 295-8280	( ) -
Wells Grover	3463 South 1360 East	Salt Lake City	UT	84106	( ) 485-2886	( ) -
Suzanne Gustin					( ) 583-2305	( ) -
Eleanor Hall	7234 South 2825 East	Salt Lake City	UT	84121	( ) -	( ) -
H.V. Hall	7234 South 2825 East	Salt Lake City	UT	84121	( ) -	( ) -
Marilyn Hansen	4847 South 1735 East, 836	Salt Lake City	UT	84117	( ) -	( ) -
Alan Hardman					( ) 359-6869	( ) 328-4259
Jan Hardy					( ) 581-0719	( ) -
Bill Harman	86 Northridge Way	Sandy	UT	84092	( ) 571-6441	( ) 263-2354
Nadine Harmon	708 Pueblo Street				( ) 521-2489	( ) -
Sue Harry	3800 South 3020 East	Salt Lake City	UT	84109	( ) 278-2587	( ) -
Kristi Haslam	875 South 1330 East				( ) 566-0896	( ) -
Floyd Garn Hatch	2011 Bryan Avenue	Salt Lake City	UT	84108	( ) 581-1073	( ) -
Linda Hayes	7226 South 2870 East	Salt Lake City	UT	84121	( ) 943-6225	( ) -
Laurie Healy					( ) 486-2482	( ) -
Melanie Heaps	1473 East 8020 South				( ) -	( ) -
Victer Heath					( ) 561-3414	( ) 484-4221
Gordon Hegewald	Sigma Chi House				( ) 277-3867	( ) -
Carolyn Herbert	2809 Wilshire Drive	Salt Lake City	UT	84109	( ) 467-0568	( ) -
Jeremiah Hermansen	2315 Sheridan Rd	Salt Lake City	UT	84108	( ) 583-7041	( ) -
Justin Hermansen	2315 Sheridan Rd	Salt Lake City	UT	84108	( ) 583-7041	( ) -
Lynn Hill					( ) -	( ) -
Marilyn Hillstead					( ) 486-9273	( ) -
Susan Holmes					( ) 524-4394	( ) -
Jennifer Howes	8954 South Capella	Sandy	UT	84092	( ) 561-3414	( ) -
Julie Jones					( ) 583-3211	( ) -
Jeanne Jackman	2610 West 10950 South				( ) 254-4525	( ) -
Tess Jackman					( ) 255-5730	( ) -
Jerrell James	1456 Anthony Cir	Salt Lake City	UT	84104	( ) 972-4468	( ) -
Jerrell James					( ) 972-4468	( ) 969-3456
Cal Jenkins					( ) 277-6358	( ) 487-4939

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Joy Jensen					( ) 364-2099	( ) -
Helen Jeppson	5508 South Chaparral Dr.	Murray	UT	84107	( ) 268-2362	( ) -
Tonya Jerry	8816 South 1595 East	Sandy	UT	84092	( ) 561-0956	( ) -
Eric Johnson	8549 Mesa Dr.	Sandy	UT	84092	( ) 561-3628	( ) -
Gaylene Johnson	1252 East Keith Dr	Sandy	UT	84070	( ) 562-4597	( ) -
Heather Johnson	8043 South 1330 East				( ) 255-5951	( ) -
Kenneth Johnson					( ) 266-1960	( ) -
Lesa Johnson					( ) 364-3381	( ) -
Lyndell Johnson					( ) 487-2348	( ) -
Cindy Jorgensen					( ) 466-3495	( ) -
Doris Jorgensen	2129 East Lawnsdale Dr.	Salt Lake City	UT	84121	( ) 942-1519	( ) -
Mary Lou Judd	125 West Harris	Salt Lake City	UT	84115	( ) 467-1923	( ) -
Lisa Kalm					( ) 272-2270	( ) -
Heidi Kammerath	1380 East 8020 South				( ) 561-4648	( ) -
Karolynn Kemple	5986 Dixie Drive	West Valley City	UT	84120	( ) -	( ) -
Blair Kent					( ) 295-7114	( ) -
Eddie Kent					( ) 295-7114	( ) -
Trish Kent					( ) 295-7114	( ) -
Ron Kidd	419 East 10450 South	Sandy	UT	84070	( ) 572-5508	( ) -
JoAnn Wong Kilpatrick	766 East Third South	Salt Lake City	UT	84102	( ) -	( ) -
Rod Knowlton	1388 Roxbury Rd	Salt Lake City	UT	84108	( ) 582-9904	( ) -
Kristen Kobogash					( ) 972-1729	( ) -
Heath Koch	1959 Falcon View Dr.				( ) -	( ) -
Joan Lamont					( ) 481-4842	( ) -
Ken Lantis					( ) 268-9674	( ) -
Jessica Larson	1389 Michigan Ave				( ) 583-0822	( ) -
Doug Lecheminant	155 N Canyon Rd #12C	Salt Lake City	UT	84103	( ) 364-2903	( ) -
Glenda Lehmkuhl					( ) 943-6428	( ) -
Ryan Leuce	1380 Chancellor Drive	Salt Lake City	UT	84108	( ) 581-9617	( ) -
Bunny Lewis					( ) 466-8833	( ) -
Myrle Lowe					( ) 483-0499	( ) -
Paula and Tom Lukow					( ) 364-7395	( ) -
Gary Lyman					( ) 485-1123	( ) -
Cherie Lyon	1700 Oak Lane				( ) -	( ) -
Melita Malloy					( ) 268-2235	( ) -
Aaron Mansell	9997 Aplomada				( ) -	( ) -
Scott Mayeda					( ) 359-6516	( ) -
Michael Lee McCarroll					( ) 364-0333	( ) -
Casey McDonough	1000 South 900 Est				( ) 364-0588	( ) -
Diane McIver					( ) 942-5460	( ) -
Neva Mitchell	7304 South 2825 East				( ) -	( ) -
Brent Montgomery					( ) 278-9949	( ) -
Clara Morris	2283 Tara Lane #3	Salt Lake City	UT	84117	( ) 272-7810	( ) -
Mortensen					( ) 533-7751	( ) -
Valerie Musgrove					( ) 524-4394	( ) -
Ellie Mutt	1207 East South Temple	Salt Lake City	UT	84103	( ) 328-1207	( ) -
Jeff Nakashima	1439 Colony Dr.	Salt Lake City	UT	84117	( ) 278-6717	( ) 322-1205
Russ Neilan					( ) 466-3605	( ) -
Russ Neilay	263 Wilson				( ) 466-3605	( ) -
Dorothea Neilson	1375 Westminster				( ) 486-0404	( ) -

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Thea Neilson	1375 Westminster				( ) 486-0404	( ) -
Andrew Nelson	2627 Sherwood Dr.	Salt Lake City	UT	84108	( ) 582-7393	( ) -
Sharon Nicoles	1628 Lake St.				( ) -	( ) -
Rick Norris					( ) 943-5126	( ) -
Sam Norris	1520 Canterbury Dr.	Salt Lake City	UT	84108	( ) 582-7616	( ) -
Ken Okazaki					( ) 532-6534	( ) -
Devon Olsen					( ) 582-4398	( ) -
Jeff Olsen	8204 West 33205 South	Magna	UT	84044	( ) 250-5474	( ) -
Vickie Olsen	1388 Granada Dr.	Sandy	UT	84092	( ) 571-5046	( ) -
Sue Ellen Oniki	1859 Cottonwood Club	Salt Lake City	UT	84117	( ) 277-9855	( ) -
Rikard Osthed	1974 East Falcon View Dr				( ) 571-9139	( ) -
John Pearce	3525 South 6935 West	West Valley City	UT	84120	( ) 250-5899	( ) -
Beth Poindexter	447 Wilford Ave	Murray	UT	84107	( ) 268-0167	( ) -
Steve Poulton					( ) 467-0244	( ) 486-7535
Roberta Rasmussen	1222 West Wasatch Ave.				( ) 322-5050	( ) -
Allison Reber	1430 East 8020 South	Sandy	UT	84092	( ) 562-2326	( ) -
Janet Reber	1430 EAst 8020 South	Sandy	UT	84092	( ) 561-2326	( ) -
Michelle Reber	1430 East 8020 South	Sandy	UT	84092	( ) 561-2326	( ) -
Jim Reynolds	1611 South West Temple				( ) 486-6743	( ) -
Raquel Richenvach	7885 Manzano r.				( ) 561-3233	( ) -
Robert Roberts	4187 Holloway Dr.	Holladay	UT	84124	( ) 278-0066	( ) -
Jimmy Rodriguez	P.O. Box 404	Sandy	UT	84091	( ) -	( ) -
Joan Rove					( ) 943-6876	( ) -
Susan Schildmeyer					( ) 571-9450	( ) -
May-Cathleen Schmidt					( ) -	( ) -
Stacey Schultz	103 East 7060 South	Midvale	UT	84047	( ) 561-4679	( ) -
Linda Scott					( ) 262-4356	( ) -
Leland Senesac					( ) 377-4431	( ) -
Kim Shelly					( ) 942-0544	( ) -
Ted Shimizu	6362 S Pawnee	Salt Lake City	UT	84118	( ) 966-8031	( ) 483-6233
Ted Shimizu					( ) 595-6184	( ) -
Kimberly Shoell					( ) 942-1434	( ) -
Michael Shurtlett					( ) 966-4369	( ) -
Cathie Simmon					( ) 467-2493	( ) -
Wesley Sine					( ) 364-5125	( ) 328-3307
Coris Skinner					( ) 255-5345	( ) -
Phil Skolmiski					( ) 561-2042	( ) -
Connie Snow	2565 East 2100 South				( ) 467-3390	( ) 524-5933
Janis Stanley					( ) 363-3392	( ) -
Sylvia Suglham					( ) 572-4304	( ) -
Paul Summer	2336 West Heather Glen Dr.	West Valley	UT	84119	( ) 969-3253	( ) -
Cathy Summons	2817 Glen Oaks	Salt Lake City	UT	84109	( ) -	( ) -
Mary Takemiri	170 Pioneer	Midvale	UT	84047	( ) 255-7756	( ) -
Amy Tamita	2533 South 5th East	Salt Lake City	UT	84106	( ) 467-3913	( ) -
Nona Tanner	2932 Kentucky Ave				( ) 278-5551	( ) -
Big Tatcher					( ) 272-2741	( ) -
Doree Tateoka	9860 South 2700 West	Riverton	UT	84065	( ) 265-1428	( ) -
Ida Tateoka	9860 South 2700 West	Riverton	UT	84065	( ) 254-4465	( ) -
Mark Tateoka					( ) -	( ) -
Bud Tateoka	5645 South Nations Way	Salt Lake City	UT	84117	( ) 278-7294	( ) -

Name	Address 1	City	St	Zip	Home Phone	Work Phone
Neil Taylor	7960 Bridgton				( ) 250-6367	( ) -
Karen Teuscher	2430 1/2 Lambourne Ave				( ) 485-0866	( ) -
Jeff Thomas	10017 South Falcon View Dr.				( ) 571-7299	( ) -
Bot Thorop					( ) 582-4197	( ) -
Winks Tilby					( ) 943-0515	( ) -
Doug Toggaert					( ) 531-7979	( ) -
David Tyler	8445 South 1380 Est				( ) -	( ) -
Laura Tyler	8445 South 1380 East				( ) -	( ) -
Magen Tyler	8445 South 1380 East				( ) -	( ) -
Sherilyn Tyler	8445 South 1380 East				( ) 255-5673	( ) -
Jennifer Tyrrell	553 3rd Avenue				( ) 328-8599	( ) -
Tony Ushio	407 East 600 South				( ) 277-2280	( ) -
Bob Vanleperen					( ) 942-4339	( ) -
Den Walker	1324 South 1000 East				( ) 487-2260	( ) -
Max Ware					( ) 566-8975	( ) -
Robert Watson					( ) 262-6906	( ) -
Kevin Watts					( ) 277-2618	( ) -
The Chyn Wee					( ) 262-8922	( ) -
Vernon Weston					( ) 485-5705	( ) -
Bob and Linda Westover	8466 Strate Dr.	Sandy	UT	84092	( ) 561-5136	( ) -
Trent Whipple	1165 Lake Street				( ) 521-7278	( ) -
Paulene Whitehead					( ) 277-5793	( ) -
G.B. Whitney					( ) 943-9549	( ) 262-9805
Ruth Wilkinson	2905 East 7000 South	Salt Lake City	UT	84121	( ) -	( ) -
Peggy Williams	1621 South West Temple	Salt Lake City	UT	84101	( ) 467-7435	( ) -
Gary Wilson					( ) 359-2155	( ) -
Carolyn Winegar	9470 South 2730 East	Sandy	UT	84092	( ) 942-5057	( ) -
Joann Wong	766 East 300 South	Salt Lake City	UT	84102	( ) 363-6578	( ) -
Jeff Woodbury					( ) 485-6963	( ) -
Jayne Wyatt					( ) 278-3896	( ) -
Steven Yazi					( ) 485-6624	( ) -
Tas Yokita	10 Circle Oaks	Sandy	UT	84092	( ) 571-1709	( ) -
Frank Yoshimuri					( ) 484-6994	( ) -
Gary Zaugg	331 East Park Creeke Lane	Salt Lake City	UT	84115	( ) 487-4843	( ) -
Linda Zilner					( ) 255-7396	( ) -

$ 0.00

Communication Graphics

6209 Stratler Street • Murray, Utah 84107 • (801) 266-5757

INVOICE

1226

P.O. Number _____

Shimizu For Congress
Utah State Republicah Party
643 East 400 South 84102

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct 27, 1986

CUSTOMER PURCHASE ORDER NO: _____

TERMS: _____

Description	Amount
48,000 You Can Tell alot about A Man by the Company He Keeps(11" x 17" Brochures)	$2880,00
36,500 Garn Letters(Blue& Black)	$2190.00
(Pre P.S. Statement: Plate Change after running 14,000 on 1 side: Cost of Paper/Time & Plate Change)	$153.00
Garn/Shimizu Letter(Red/Black) 48,000	$2880.00
Typesetting/Pasteup/PMT/Design of Garn Brochures	92.00

TERMS: NET 30 DAYS. A FINANCE CHARGE of 1½% per month (18% ANNUAL RATE) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

RECEIVED BY _____
CUSTOMER SIGNATURE

Sub Total	$8195.00
Tax	471.21
Total	$8666.21

5 2 7 8 7 0 4 0 0 0

E

UTAH REPUBLICAN PARTY
FEDERAL CAMPAIGN FUND
150 SOUTH 600 EAST #2B 533-9777
SALT LAKE CITY, UTAH 84102

979

№ 1383

ZIONS
FIRST NATIONAL BANK
102 South Main Street
Salt Lake City, Utah 84101
31-5/1240

PAY Eight Thousand Six Hundred Sixty Six and 21/100 Dollars-------

DATE 11/3/86

AMOUNT $ 8,666.21

ORDER OF

Communication Graphics
6209 Stratler Street
Murray Utah 84107

NOT NEGOTIABLE

⑈000138 3⑈ ⑆124000054⑆ 01 13953 4⑈

VPR Rocky Mountain Bank Note

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		PRINTING			

EMPLOYEE'S NAME

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND
SALT LAKE CITY, UTAH

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	F.I.C.A.	FED. WITH TAX	STATE WITH TAX				NET EARNINGS PAID
	REG. T. O.T.									

EMPLOYEE: THIS IS A STATEMENT OF YOUR EARNINGS AND DEDUCTIONS FOR PERIOD INDICATED. KEEP THIS FOR YOUR PERMANENT RECORD.

0004073 4

CCC #8906

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 MAR 28 AM 11:33

UTAH REPUBLICAN PARTY

H. CRAIG MOODY
Chairman
DONNA M. DAHL
Vice Chairman
JACK E. ROBERTS
Secretary
MICHAEL L. JONES
Treasurer
ZENDA HULL
National Committeewoman
WILBERN L. McDOUGAL
National Committeeman

March 25, 1988

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

88 MAR 28 PM 2:42
RECEIVED
FEDERAL ELECTION COMMISSION

RE: MUR 2288

Dear Patty:

This letter is to inform you that the Utah Republican Party has retained Robert S. Campbell, Jr. and his firm Watkiss & Campbell to represent the Utah Republican Party in reference to MUR 2288.

All correspondence and inquiries should henceforth be made directly to him or Dixon Burton at 310 South Main Street, 12th floor, Salt Lake City, UT 84101, (801) 363-3300.

They will be in contact with you concerning any outstanding inquiries.

Sincerely,

H. Craig Moody
Chairman

543 EAST 400 SOUTH · SALT LAKE CITY, UTAH 84102
801-533-9777

FEDERAL ELECTION COMMISSION
SECRETARIAT
SENSITIVE
88 MAR 28 AM 10:31

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer	)	MUR 2288

COMPREHENSIVE INVESTIGATIVE REPORT #2

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("State Party") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a). On December 10, 1987, the Commission considered the State Party's request for pre-probable cause conciliation and determined that further discovery was warranted in this matter and directed this Office to circulate additional questions for Commission approval. The Commission approved these interrogatories on January 27, 1988, and they were sent to the State Party on February 4, 1988. The State Party received a twenty day extension of time to respond until March 15, 1988.

On March 21, 1988, this Office received the State Party's response. Although helpful to discovery in this matter, this response did not include all requested information regarding the services provided by one of the commercial vendors used to print materials said to be within the volunteer exemption. After being contacted by this Office, the State Party's office manager

0 4 0 7 8 2 7 3 6

agreed to provide expeditiously a supplemental response. After receiving and evaluating this additional information, this Office will report to the Commission with appropriate recommendations.

3/28/88
Date

Lawrence M. Noble
General Counsel

9004078737

Staff person: Patty Reilly

CCC# 9070

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 APR 15 AM 9:40

LAW OFFICES

WATKISS & CAMPBELL

A PROFESSIONAL CORPORATION

TWELFTH FLOOR

310 SOUTH MAIN STREET

SALT LAKE CITY, UTAH 84101-2171

TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3892

WRITER'S DIRECT NUMBER:

DAVID K. WATKISS
ROBERT S. CAMPBELL, JR.
JAMES P. COWLEY
HERSCHEL J. SAPERSTEIN
H. WAYNE WADSWORTH
WILLIAM VOGEL
PHILIP C. PUGSLEY
GLEN E. DAVIES
ROBERT D. MAACK
MICHAEL F. HEYREND
GREGORY B. MONSON
ALLAN T. BRINKERHOFF
WESTON L. HARRIS
E. BARNEY GESAS
LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
D. RANDALL TRUEBLOOD
VINCENT C. RAMPTON
JOSEPH T. DUNBECK, JR.
THOMAS P. MELLOY
TRACY H. FOWLER
R. L. KNUTH
DENNIS J. CONROY
STEVEN T. WATERMAN
KEN P. JONES
DEBRA J. MOORE
CASS C. BUTLER
H. DICKSON BURTON
DANIEL J. TORKELSON
KEVIN R. ANDERSON
MARTIN R. DENNEY
STEVEN E. McCOWIN
CAROLYN COX
MARCO B. KUNZ
WILLIAM H. CHRISTENSEN
CASEY K. McGARVEY
MARY T. NOONAN
C. SCOTT BROWN
LESLIE J. RANDOLPH
BRETT F. WOOD

OF COUNSEL
ZAR E. HAYES
RICHARD B. FERRARI
FRANKLIN N. SMITH, JR.

March 31, 1988

Patty Reilly, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20003

88 APR 15 PM 2:27

RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 2288, Utah Republican Party Investigation

Dear Miss Riley:

This letter will confirm our telephone conversation of Monday, March 28, in which I advised you that I am general counsel for the Utah Republican Party and have been retained only the last several days in connection with the above-referenced matter.

This will advise that you may direct all communications and inquiries to me as counsel for the State Republican Party in this matter and I will in turn transmit all correspondence, communications and information to you, unless you direct otherwise.

In our telephone conversation, you requested additional information regarding the mailer "This is the Door" and also whetner the Republican Party wished to withdraw its request for conciliation. I am currently assembling the material on the mailer and will be back to you within the next several days. As to the reconciliation request, it is my view that the State Republican Party wishes to reaffirm that earlier decision but I will advise you of that when we talk the first of next week.

I look forward to working with you toward a speedy resolution of this matter. If you have any question and I am unavailable, you may contact my associate, H. Dickson Burton of this office, who is assisting me on the case.

Sincerely yours,

Robert S. Campbell Jr.

ROBERT S. CAMPBELL, JR.
General Counsel
Utah State Republican Party

RSC/dd
cc: H. Craig Moody

FEDERAL ELECTION COMMISSION RECEIVED
88 APR 29 PM 4:21

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288
	)	

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #3

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("State Party") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a). 1/ On December 10, 1987, the Commission considered the State Party's request for pre-probable cause conciliation and determined that further discovery was warranted in this matter and directed this Office to circulate additional questions for Commission approval. The Commission approved these interrogatories on January 27, 1988, and they were sent to the State Party on February 4, 1988.

On March 21, 1988, this Office received the State Party's response. Although helpful to discovery in this matter, this response did not include all requested information regarding the services provided by one of the commercial vendors used to print materials said to be within the volunteer exemption. After being contacted by this Office, the State Party's office manager agreed to file a supplemental response.

On March 28, 1988, this Office was contacted by newly hired counsel for the State Party. Following initial discussions

1/ The Committee's current treasurer is Michael L. Jones.

0040782739

regarding the matter, counsel and this Office held an April 19, 1988 telephone meeting to discuss the information required by the Commission. Counsel stated that the information previously provided to the Commission regarding the costs of certain expenditures may have been incorrect. Additionally, counsel stated that some of the expenditures in question may have been made from the state account and not the federal account. 2/ Counsel stated that additional documentation would be provided to the Commission and that his clients would reiterate their prior request for pre-probable cause conciliation. After receiving and reviewing this documentation, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble
General Counsel

Date 4/27/88

2/ The State of Utah allows contributions that would be excessive and prohibited under the Act.

Staff Person: Patty Reilly

0040076240

MUR 2288

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES

WATKISS & CAMPBELL

A PROFESSIONAL CORPORATION
TWELFTH FLOOR
310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

DAVID K. WATKISS
ROBERT S. CAMPBELL, JR.
JAMES P. COWLEY
HERSCHEL J. SAPERSTEIN
H. WAYNE WADSWORTH
WILLIAM VOGEL
PHILIP C. PUGSLEY
GLEN E. DAVIES
ROBERT D. MAACK
MICHAEL F. HEYREND
GREGORY B. MONSON
ALLAN T. BRINKERHOFF
WESTON L. HARRIS
E. BARNEY GESAS
LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
D. RANDALL TRUEBLOOD
VINCENT C. RAMPTON
JOSEPH T. DUNBECK, JR.
THOMAS P. MELLOY
TRACY H. FOWLER
R. L. KNUTH
DENNIS J. CONROY
STEVEN T. WATERMAN
KEN P. JONES
DEBRA J. MOORE
CASS C. BUTLER
H. DICKSON BURTON
DANIEL J. TORKELSON
KEVIN R. ANDERSON
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WILLIAM H. CHRISTENSEN
CASEY K. MCGARVEY
MARY T. NOONAN
C. SCOTT BROWN
LESLIE J. RANDOLPH
BRETT F. WOOD

OF COUNSEL
ZAR E. HAYES
RICHARD B. FERRARI
FRANKLIN N. SMITH, JR.

TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3892

WRITER'S DIRECT NUMBER:

88 MAY -3 AM 9:15

April 25, 1988

Patty Reilly, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20003

88 MAY -3 AM 11:48
RECEIVED
FEDERAL ELECTION COMMISSION

Re: Utah Republican Party
MUR 2288

Dear Patty:

With respect to the above-referenced matter, I am enclosing the additional documentation which you requested. Included are the following:

1. Invoices and checks from the two radio ads.

2. An October 11, 1986 invoice and check, representing payment for the "This is the Door" mailer, as well as additional "The Company He Keeps" mailers.

3. The invoice dated October 30, 1986 from Progressive Direct Mail with accompanying check.

4. The "Garn/Shimizu letter".

5. Affidavits of Arlene Ellis and Gregory L. Hopkins concerning the volunteer efforts with respect to the mailers.

In response to your inquiries, I further submit the following:

A. "The Company He Keeps" Mailer: As you noted, the invoice to Communication Graphics dated October 27, 1986, which totals $8,666.21, lists only $2,880.00 for the "The Company He Keeps" mailer.

We have no reason to believe that any more than that amount was paid on that invoice. However, on the invoice from Communications Graphics, dated October 11, 1986, you will note that the figure $9,072.00 is attributed to 75,600 brochures measuring 22" X 8-1/2", and 75,600 brochures measuring 11" X 17". We believe that the 11" X 17" mailers were additional "The Company He Keeps" mailers. The larger mailers were the "This is the Door" mailers, and, therefore, one-half of the $9,823.11 from the October 11, 1986, invoice of Communications Graphics should be attributed to the "The Company He Keeps" mailer. With labeling costs, this brings the total amount paid for that mailer to $9,162.89 (See attached schedule). Likewise, only $4,911.56 should be attributed to the "This is the Door" mailer.

B. Garn/Shimizu Letter: As you noted, the October 27, 1986 invoice also lists a payment of $2,880.00 for 48,000 "Garn/ Shimizu" letters. This mailer is enclosed herewith, and was also part of the volunteer intensive effort. As stated in the Affidavits of Greg Hopkins and Arlene Ellis, the letter was part of the same volunteer intensive efforts as were the other two mailers.

C. Radio ads: The party stands by its assertion that the radio ads were for "party building" and were not candidate specific.

As we stated in our telephone conversation, the party regretfully acknowledges that state funds, rather than federal funds were inadvertently used to pay for the printing of some of the mailers and for labeling costs. This figure amounts to $13,434.29 and is represented by the invoices and checks attached at tabs 2 and 3. The party is prepared to reimburse the state account with existing federal funds.

If you have any further questions, please do not hesitate to call me.

Very truly yours,

H. DICKSON BURTON

HDB:pm

Encls.

"THE COMPANY HE KEEPS" MAILER

Printing	$4,911.56	1/2 of 10/11/86 invoice amount
Printing	$2,880.00	10/27/86 Invoice to
Tax	$ 157.00	Communications Graphics
Labeling	$1,214.33	10/30/86 invoice to Progressive Direct Mail
Total	$9,162.89	

"THIS IS THE DOOR" MAILER

Printing	$4,911.56	1/2 of 10/11/86 invoice amount
Labeling	$ 772.11	
Total	$5,683.67	

THE GARN/SHIMIZU LETTER

Printing	$2,880.00	10/27/86 Invoice to
Tax	$ 157.00	Communications Graphics
Labeling	$ 299.01	10/30/86 Invoice to Progressive Direct Mail
Total	$3,336.01	

PAID OUT OF STATE FUNDS

$9,823.11	10/11/86 Invoice to Communications Graphics
$3,611.18	10/30/86 Invoice to Progressive Direct Mail
$13,434.29	

0 7 0 4 0 7 8 2 7 4 3

UTAH REPUBLICAN PARTY
[redacted] 801-533-9777
04/73 SALT LAKE [redacted], UT [redacted] 84102

ZIONS FIRST NATIONAL BANK
[redacted]
Salt L[redacted]y, U[redacted]4101

4963

Oct. 15 19 86

31-6
1240

PAY Five Bhousand Two Hundred Thirty Two and 90/100 Dollars--------DOLLARS $ 5,232.90

TO THE ORDER OF
First Tuesday
1358 South Main
SLC, UT 84115

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
	Radio Buy 910			

E

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC TAX	S.D.I.	STATE INCOME TAX			

⑈0407027744

First Tuesday
Advertising & Public Relations

Invoice # 068 (068)

Date: 10/6/86

To: Utah Republican Party
643 East 400 South
Salt Lake City, UT 84102

Client	Job Description	Amount
110-03	Radio Media Buy	
	KALL	$ 732.00
	KSL	1,980.00
	KSFI	1,440.00
	KKAT	810.00
		4,962.00
110-04	Radio Production	
	Studio/Dubs	102.90
	Talent	108.00
	Producer	60.00
		270.90
	TOTAL DUE	$5,232.90

2004078274

4614

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH [illegible] 801-[illegible]-8777
SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
[illegible]
Salt Lake City, Utah 84101

31-8/1240
[illegible]

PAY One Thousand Three Hundred Thirty and No/100 Dollars

DATE 7/18/86

AMOUNT $ 1,330.00

TO THE ORDER OF KSFI Radio

Judith W. Parker

NON-NEGOTIABLE

⑈024614⑈ ⑆124000054⑆ 01 13550 8⑈

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT CR WORDS NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NET EARNINGS PAID
	REG. T. O.T.									

EMPLOYEE: Keep this statement for your records. DO NOT return it to the Accounting Department unless requested.

0 0 0 4 0 7 0 2 7 4 3

4615

UTAH REPUBLICAN PARTY
[redacted] 801-538-8777
SALT LAKE CITY, UTAH 84102

478

ZIONS FIRST NATIONAL BANK
[redacted]
Salt Lake City, Utah [redacted]

31-6/1240
[redacted]

PAY One Thousand Three Hundred Sixty and No/100 Dollars

DATE 7/10/86

AMOUNT $ 1,360.00

ORDER OF KSL Radio

Judith W. Payne

NONNEGOTIABLE

⑈004615⑈ ⑆124000054⑆ 01 [redacted] 8⑈

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	F.I.C.A.	FEDERAL TAX	STATE TAX				NET EARNINGS PAID
	REG. O.T.									

EMPLOYEE: THIS IS A STATEMENT OF YOUR EARNINGS FOR INCOME TAX PURPOSES. KEEP IT WITH YOUR PERMANENT RECORDS

0004615

4613

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH [illegible] 801-532-6777
SALT LAKE CITY, UTAH 84102

478

ZIONS FIRST NATIONAL BANK
[illegible]
Salt Lake City, Utah 84101

31-6/1240
[illegible]

PAY One Thousand Three Hundred Thirty One and 20/100 /Dollars

DATE 7/10/86

AMOUNT $ 1,331.20

TO THE ORDER OF KALL Radio

Judith W. Parker

NON-NEGOTIABLE

⑈004613⑈ ⑆124000054⑆ 01 13550 8⑈

* N O T E : DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	[illegible]	[illegible]	STATE [illegible]				NET EARNINGS PAID
	REG. E. O.T.									

EMPLOYEE: This is a statement of your earnings and deductions. Keep this for your permanent records.



First Tuesday
Advertising & Public Relations

Utah Republican Party

Invoice: 7/11/86

Media Buy:

KSL- Radio	:	$1,330
KSFI	:	$1,360
KALL	:	$1,331.20
Total	:	$4,021.20

0004078274 9

1358 SOUTH MAIN STREET ☐ SALT LAKE CITY, UTAH 84115 ☐ 801-484-0165

KALL-AM **I N V O I C E**

INVOICE DATE: 07/28/86 PAGE 1

PLEASE REMIT TO: SALT LAKE CITY BROADCASTING CO
312 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111

INVOICE NUMBER: 9742- 2

ORDER DATES: 07/11/86 - 07/17/86

BILLING DATES: 06/23/86 - 07/27/86

DESCR: UTAH REPUBLICAN PARTY

TO: 1ST TUESDAY ADVERTISING & P R (350)
1358 S MAIN STREET
SALT LAKE CITY, UT 84115

ADVT: UTAH REPUBLICAN PARTY (1771)

TERMS: DUE UPON RECEIPT ACCT EXEC: RICHARDSON, LARRY G.

RUN DATE	TIME	DESCRIPTION	REF	LENGTH	QTY	RATE	AMOUNT
07/11/86	7:08A						
07/11/86	9:08A		1	0:30	2	52.00	104.00
07/11/86	11:13A						
07/11/86	1:39P		2	0:30	2	52.00	104.00
07/11/86	3:54P						
07/11/86	5:52P		3	0:30	2	52.00	104.00
07/11/86	9:09P		4	0:30	1	52.00	52.00
07/14/86	6:39A						
07/14/86	8:53A						
07/15/86	8:13A						
07/16/86	8:25A						
07/17/86	6:26A		5	0:30	5	52.00	260.00
07/14/86	11:13A						
07/14/86	1:39P						
07/15/86	10:51A						
07/15/86	1:54P						
07/16/86	10:25A						
07/17/86	10:13A						
07/17/86	12:39P		6	0:30	7	52.00	364.00
07/14/86	3:31P						
07/14/86	5:03P						
07/15/86	3:54P						
07/15/86	5:41P						
07/15/86	2:42P						
07/16/86	6:09P						
07/17/86	3:10P						
07/17/86	5:07P		7	0:30	8	52.00	416.00
07/14/86	9:20P						
07/15/86	8:20P						
07/16/86	8:48P						
07/16/86	11:08P						
07/17/86	7:48P		8	0:30	5	52.00	260.00
					32		1664.00

COPY

WE WARRANT THAT THE ABOVE ANNOUNCEMENTS WERE BROADCAST IN ACCORDANCE WITH OFFICIAL STATION LOGS AS SHOWN ABOVE.

AGENCY COMMISSION: -249.60

TOTAL AMOUNT DUE: 1414.40

9 0 0 4 0 7 8 2 7 5 1

UTAH REPUBLICAN PARTY
645 EAST 400 SOUTH [illegible] 801-533-9777
04973 SALT LAKE CITY [illegible] 84102

[illegible] NATIONAL BANK
[illegible]
Salt Lake City [illegible] 84101

4998

Oct. 24 19 86

31-5
1240

PAY Three Thousand Eight Hundred Twenty Three and 11/100 Dollars------ DOLLARS $ 3,823.11

TO THE ORDER OF
[illegible]ication Graphics
[illegible]Center Street
[illegible]

NOT NEGOTIABLE

⑈124000054⑈ 01 43550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	S.D.I	STATE INCOME TAX			

⑆124000054⑆ 0 7 8 2 7 5 2

Communication Graphics

6209 Stratler Street • Murray, Utah 84107 • (801) 266-5757

INVOICE

P.O. Number 1213

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct. 11, 1986

CUSTOMER PURCHASE ORDER NO:

TERMS: C.O.D.

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Description	Amount
Tom Shimizu for Comgress	
75,600 2-Color Brochures (22" x 8½") #70 Stock	
75,600 2-Color Brochures (11" x 17") #70 Stock	
Printing/Folding @ 6¢ ea	$9072.00
Typesetting/Art/Design & Pasteup	217.00

TERMS: NET 30 DAYS. A **FINANCE CHARGE** of 1½% per month (**18% ANNUAL RATE**) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

RECEIVED BY _____
CUSTOMER SIGNATURE

Sub Total	$9289.00
Tax	$534.11
Total	$9823.11

0 0 0 4 0 7 8 4 7 5 3

0004078754

UTAH REPUBLI[illegible] PARTY
043 EAST 400 SOU[illegible] 801-533-9777
04/73 SALT LAKE [illegible], UTA[illegible]4102

[illegible] FIRST [illegible] NAL BANK
[illegible] Salt L[illegible], Uta[illegible]101

5038

31-5
1240

Oct 31 19 86

PAY Three Thousand Six Hundred Eleven and 10/100 Dollars---------- DOLLARS $ 3,611.1[illegible]

Progressive DirectoMail

TO THE ORDER OF

NOT NEGOTIABLE

⑈124000054⑈ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	SDI	STATE INCOME TAX			

⑆004007827155⑆

Progressive Direct Mail Advertising
2089 West 2300 South * Salt Lake City, Utah 84119
Phone (801) 972-8288

INVOICE

SOLD TO:

Utah Republican Party
643 East 400 South #A
Salt Lake City, Utah 84102

INVOICE NO: 35157
INVOICE DATE: 30 October 1986
YOUR P.O. NO.
TERMS Net

Please Pay This Amount

QUANTITY	DESCRIPTION	AMOUNT
	Jim Hansen "Is There Really A Difference"	
43484	Labeling, sorting and bulk mail handling	434.84
	Wayne Owens Door-Tom Shimizu	
77211	Labeling, sorting and bulk mail handling	772.11
	Tom Shimizu-The Company He Keeps	
118933	Labeling, sorting and bulk mail handling-with set up	1214.33
	Tom Shimizu-Blue Jake Garn Letter	
29901	Labeling, sorting and bulk mail handling	299.01
	Tom Shimizu-Red 1 + 1 Letter	
30526	Labeling, sorting and bulk mail handling	305.26

Paid
10-31-86
$3025.55
5038

POSTAGE RESERVE	
POSTAGE USED	
POSTAGE DUE * OR CREDIT	

RESALE NO.

SALES TAX Exempt

* POSTAGE DUE OR CREDIT

TOTAL INVOICE 3025.55

Payment is due upon completion of work. Purchaser agrees to pay interest and service charges at the rate of 1 1/2% PER MONTH, WHICH IS AN EFFECTIVE RATE OF 18% PER ANNUM, on all accounts over 30 days from date of invoice. In the event of default of payment of items shown above, the purchaser agrees to pay collection fees including reasonable attorney fees.

0 0 0 4 0 7 8 2 7 5 0

9 0 0 4 0 7 6 4 7 5 1

Jake Garn
UNITED STATES SENATOR

October 22, 1986

Dear Fellow Utahn,

When you vote on Tuesday, November 4th, you will make two decisions that will greatly impact my future.

If you decide you do want me to continue to represent you in the Senate, then I ask that you consider very carefully who you vote for in this year's race in the Second Congressional District. In order for me to be as effective as possible, I need Tom Shimizu in the Congress.

First, you will cast a vote that will decide whether or not I am to serve another term in the United States Senate. It has been an honor for me to represent you as your Senator and I hope you will support me on election day.

You see, everytime we in the Senate try to cut spending, increase efficiency in government programs, or eliminate unnecessary regulations, the Democrats who control the House of Representatives oppose our efforts. Time after time we pass what I consider to be sound legislation or reasonable budgets in the Senate, only to have them ruined by the House.

If Tom Shimizu were in Congress, we could be sure that there would be one more vote towards balancing the budget, cutting government waste, and supporting economic growth.

I know I'll be able to count on Tom. He is an honest and trustworthy person. His political philosophy is very much like mine. Tom Shimizu's experience as a County Commissioner will make him an excellent Congressman. He knows what it's like to work with federal programs and understands how they need to be improved to better serve the people of the Second District.

If you support me and if you support President Reagan, it just doesn't make sense to vote for someone who will fight against us most of the time. I need a partner in the U.S. Congress who will work with me. we need Tom Shimizu.

I hope you will help us by voting for Tom on November 4th.

Sincerely,

Jake Garn

Jake Garn
United States Senator

0 0 0 4 0 7 6 7 8

Paid for by the Utah State Republican Party

JAKE GARN
U.S. Senate

TOM SHIMIZU
U.S. Congress

ON
NOVEMBER 4th
ELECT AN
IMPORTANT TEAM
FOR UTAH

UTAH STATE REPUBLICAN PARTY
643 East 400 South
Salt Lake City, Utah 84102

NON-PROFIT
Salt Lake City
Permit No. 1852

GET LOST, JAKE BOY,
BOTH YOU AND SHIMIZU !!!

An Important Message From Senator Jake Garn

THE LEIDY FAMILY
OR CURRENT RESIDENT
739 SOUTH 700 E 8
SALT LAKE CITY, UTAH 84102

Your Vote is More Than Just a Vote

9004078 2760

BEFORE THE FEDERAL ELECTION COMMISSION

In Re: UTAH REPUBLICAN PARTY, MUR 2288	:	AFFIDAVIT OF ARLENE ELLIS

STATE OF UTAH)
) ss.
COUNTY OF SALT LAKE)

I, ARLENE ELLIS, having been duly sworn hereby depose and say:

1. I am over 21 years of age.

2. During the 1986 campaign, I worked as the Volunteer Coordinator for the campaign of Tom Shimizu for United States Congress in the Second Congressional District of Utah.

3. In that position I was responsible for enlisting and overseeing the work of over 240 volunteers.

4. Most of the work done by the volunteers during a three week period in October of 1986 was to work on the "This is the Door", "The Company He Keeps" and the Garn/Shimizu letter mailers and prepare them for mailing by stamping the bulk rate permit on each of approximately 236,000 mailers and then bundling them for labeling. The work was performed at a building rented by the Tom Shimizu Campaign.

5. This effort constituted a large part of the time spent by many of the approximately 240 volunteers during that

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ATTORNEYS AT LAW
TWELFTH FLOOR, 310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

three-week period. At any given time, day or evening, there were approximately 10 to 20 volunteers doing nothing but working on the mailers. This volunteer effort was substantial, and the mailers would not have been possible without the volunteer work.

DATED this 28 day of April 1988.

Arlene Ellis
ARLENE ELLIS

SUBSCRIBED AND SWORN TO before me this 28 day of April, 1988.

Carol P. Darkness
NOTARY PUBLIC
Residing at Salt Lake City

My Commission Expires:

05-29-90

WATKISS & CAMPBELL
ATTORNEYS AT LAW
TWELFTH FLOOR, 310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

BEFORE THE FEDERAL ELECTION COMMISSION

In Re: UTAH REPUBLICAN PARTY, MUR 2288	:	AFFIDAVIT OF GREGORY L. HOPKINS

STATE OF UTAH)
) ss.
COUNTY OF SALT LAKE)

I, GREGORY L. HOPKINS, having been duly sworn hereby depose and say:

1. I am over 21 years of age.

2. I am currently employed as the Executive Director of the Utah Republican Party.

3. During the 1986 campaign, I was employed as a deputy campaign manager for Tom Shimizu, who was running for the United States Congress in Utah's Second Congressional District.

4. In that capacity, I had responsibility for providing facilities for volunteer workers for the Shimizu campaign. I arranged for the campaign to rent the facilities where the volunteers worked, helped set up tables and chairs, and took care of other problems as they arose. Approximately 240 volunteers worked on the Shimizu campaign.

5. During a three-week period in October of 1986, the primary volunteer effort in the Shimizu campaign was to

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SALT LAKE CITY, UTAH 84101-2171

work on the approximately 236,000 "This is the Door", "The Company He Keeps" and the Garn/Shimizu letter mailers and prepare them for mailing. During that three-week period volunteers were present at the facility during both daytime and evening hours. During most of that time I was present. At any given time, day or evening, at least 10 to 20 volunteers were doing nothing but work on the mailers.

6. The mailers known as "The Company He Keeps", "This is the Door" and the Garn/Shimizu letter would not have been possible without the significant contribution of time and effort by the volunteers.

DATED this 26 day of April 1988.

Gregory L. Hopkins
GREGORY L. HOPKINS

SUBSCRIBED AND SWORN TO before me this 26th day of April, 1988.

Tamara Evans
NOTARY PUBLIC
Residing at Salt Lake County

My Commission Expires:

11/4/91

WATKISS & CAMPBELL
ATTORNEYS AT LAW
TWELFTH FLOOR, 310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

MCC#9444

RECEIVED
FEDERAL ELECTION COMMISSION
88 JUN -6 PM 10: 19

LAW OFFICES

WATKISS & CAMPBELL

A PROFESSIONAL CORPORATION

TWELFTH FLOOR

310 SOUTH MAIN STREET

SALT LAKE CITY, UTAH 84101-2171

DAVID K. WATKISS
ROBERT S. CAMPBELL, JR.
JAMES P. COWLEY
HERSCHEL J. SAPERSTEIN
H. WAYNE WADSWORTH
WILLIAM VOGEL
PHILIP C. PUGSLEY
GLEN E. DAVIES
ROBERT D. MAACK
MICHAEL F. HEYREND
GREGORY B. MONSON
ALLAN T. BRINKERHOFF
WESTON L. HARRIS
E. BARNEY GESAS
LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
D. RANDALL TRUEBLOOD
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THOMAS P. MELLOY
TRACY H. FOWLER
R. L. KNUTH
DENNIS J. CONROY
STEVEN T. WATERMAN
KEN P. JONES
DEBRA J. MOORE
CASS C. BUTLER
H. DICKSON BURTON
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MARTIN R. DENNEY
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CAROLYN COX
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WILLIAM H. CHRISTENSEN
CASEY K. McGARVEY
MARY T. NOONAN
C. SCOTT BROWN
LESLIE J. RANDOLPH
BRETT F. WOOD

OF COUNSEL
ZAR E. HAYES
RICHARD B. FERRARI
FRANKLIN N. SMITH, JR.

TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3692

WRITER'S DIRECT NUMBER:

May 16, 1988

Patty Reilly, Esq.
Office of General Counsel
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20003

RECEIVED
FEDERAL ELECTION COMMISSION
88 JUN -6 PM 2:01

Re: Utah State Republican Party
MUR 2288

Dear Patty:

The Utah State Republican Party hereby requests pre-probable cause conciliation on the issues you have raised in the above-referenced matter.

Very truly yours,

H. DICKSON BURTON

HDB:pm

0044170427543

AFFIDAVIT OF LARRY V. LUNT

State of Utah :
:
County of Salt Lake :

I, Larry V. Lunt, having been duly sworn hereby deposes that:

1. I am over 21 years of age;

2. I have personal knowledge of facts stated herein;

3. From June of 1985 to June of 1987 I was chairman of the State Republican Party;

4. In early October, 1986, the Utah State Republican Party made a contribution of $500 to the campaign of Tom Shimizu who was running for the U.S. Congress in the Second Congressional District for the State of Utah That contribution was intended at the time to be a contribution for the primary election campaign of Tom Shimizu, which primary election took place on August 21, 1986. Since Tom Shimizu's campaign had an outstanding debt from the primary campaign in excess of $500, the $500 contribution by the Utah State Republican Party was intended to be applied towards that debt.

5. The contribution was inadvertently not designated at the time as being intended for the primary election campaign

Dated this 25th day of May, 1988.

Larry V. Lunt

Subscribed and sworn before me this 25th day of May, 1988.

My commission expires:
Aug 9, 1989

Residing at: Salt Lake City

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6CC# 9475
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
88 JUN -9 AM 11:05

June 2, 1988

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

88 JUN -9 PM 12:13
RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 2288

Dear Ms. Reilly:

This letter is in response to your inquiry regarding the above referenced case.

In October of 1986, the Shimizu for Congress Committee received a $500 contribution from the Utah State Republican Party. We were under the clear understanding that it was for primary election debt reduction; particularly since the State Party made its maximum $5,000 contribution for the general election shortly thereafter. The enclosed affidavit from then State Party Chairman, Larry Lunt, confirms the party's intent. After winning the primary election, a great number of contributions came in increasing the possibility that our computer operator missed itemizing the $500 contribution.

There were three elections during the year in which we were allowed to receive contributions. They are the State Convention, primary election and general election. The amounts contributed by the Utah State Republican Party was well below the $15,000 limit allowed, and the $500.00 for the primary election is significantly less than the $5,000.00 allowed for that election.

We regret the error but want to assure you that it was inadvertent and totally unintentional. Therefore, we kindly request that no further action be taken, particularly in light of the minimal amount in question. In the alternative, we request pre-probable cause conciliation.

Sincerely yours,

Mr. Tom Shimizu

Mr. Tom Shimizu

Encl.

9204076767

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
88 JUL -1 PM 3:41

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	MUR 2288

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

JUL 12 1988

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer, ("the Shimizu Committee") violated 2 U.S.C. § 434(b)(2) by failing to report $10,000 in contributions from the National Republican Congressional Committee ("NRCC"). 1/ Additionally, based on information obtained during the investigation, on December 10, 1987, the Commission found reason to believe the Shimizu Committee violated 2 U.S.C. § 441a(f) by accepting $5,500 in general election contributions from the Utah Republican Party ("State Party"). Moreover, because the Shimizu Committee reported only $5,000 in general election contributions from the State Party, the reason to believe notification letter noted that this failure to so report was incorporated as an additional basis for the Commission's previous determination of a violation of 2 U.S.C. § 434(b)(2). On June 4, 1988, the Shimizu Committee alternatively requested that the Commission take no further action as to these violations, or that the Commission grant its request for pre-probable cause conciliation. As

1/ Also on that date, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. §§ 441a, 434(b)(6)(B)(iv), 441d(a) and 441a(d).

developed below, this Office recommends that the Commission enter into conciliation with the Shimizu Committee.

II. ANALYSIS OF RESPONSES

A. Contributions from the NRCC

The complaint alleged that the Shimizu Committee failed to report $10,000 in contributions from the NRCC. This Office reviewed the Shimizu Committee's 1986 October Quarterly Report and determined that the Shimizu Committee had not reported contributions from the NRCC, although the NRCC had noted these contributions on its 1986 September Monthly Report. Accordingly, on March 10, 1987, the Commission found reason to believe the Shimizu Committee and its treasurer violated 2 U.S.C. § 434(b)(2).

The Shimizu Committee's response to reason to believe, submitted on April 24, 1987, indicated that the Committee filed two amendments to its 1986 October Quarterly Report. A review of the first of these amendments, filed on October 21, 1986, reveals that the Shimizu Committee reported four contributions from the NRCC between September 2, and 19, 1986, totalling $10,051.42 and indicated these were all for the general election. The second amendment, submitted on December 12, 1986, contained the contributions in question and designated $5,000 for the primary,

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$5,000 for convention debt retirement and a total of $51.42 (in-kind) for the general election. 2/ The second amendment also included copies of the $5,000 checks from the NRCC that contained these election designations. The Shimizu Committee's reporting now conforms with that of the NRCC.

Thus, it appears the Shimizu Committee initially failed to report the NRCC contributions and subsequently amended its reports prior to the filing of the complaint in this matter. This second amendment, however, did not designate these contributions correctly. Then, after receiving the complaint, the Shimizu Committee amended its 1986 October Quarterly Report to correctly report the designations of the contributions. Therefore, it appears the Shimizu Committee violated 2 U.S.C. § 434(b)(2) by failing to report the contributions from the NRCC. The attached conciliation agreement incorporates this violation.

B. Contributions from the State Party

During the course of this investigation this Office reviewed the reports of the State Party, and determined that it made a $500 general election contribution to the Shimizu Committee on

2/ The Commission has previously determined that because a party convention in Utah has the authority to nominate a candidate for election, such convention qualifies as an election under the Act, and thus it is afforded a separate contribution limitation. See A.O.s 1986-21 and 1978-30. In 1986 the Utah Republican Party had five potential nominees at the time of the convention and two potential nominees prior to the primary election.

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October 9, 1986, and a $5,000 general election contribution to the Shimizu Committee on October 27, 1986. Thus, an excessive contribution appeared to have been made. However, the Shimizu Committee failed to report this $500 general election contribution. As previously noted, on December 10, 1987, the Commission found reason to believe the Shimizu Committee violated 2 U.S.C. § 441a(f), and incorporated the Committee's failure to report this $500 contribution into the previous reason to believe finding of 2 U.S.C. § 434(b)(2).

On January 26, 1988, following notification of a possible violation of section 441a(f), the Shimizu Committee submitted a second response explaining that they had received a $500 check from the State Party in October, 1986, and that this check was intended for primary debt retirement. The Shimizu Committee further states that this amount was not itemized with contributions from party committees, but by error, was included as part of the Shimizu Committee's unitemized receipts. This response included an amendment to the public record reporting this $500 as a primary contribution from the State Party. 3/

Because the Shimizu Committee did not provide any evidence regarding the designation of this $500 contribution, this Office requested a copy of the check. After a search, the Shimizu Committee located a copy and provided it to this Office on May 9,

3/ On January 28, 1988, the State Party amended its 1986 Pre-General Election Report to change the designation of this contribution from the general to the primary.

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1988, The check indicates a handwritten notation "Other Pol. Party FOR PRIMARY." (Attachment #3) However, because prior conversations with the treasurer had indicated that this check was not designated, it appeared this designation was written by the treasurer to assist this Office in identifying the check. Upon further inquiry by this Office, by letter dated June 2, 1988, the Candidate stated that this $500 contribution was given with the "clear understanding that it was for primary debt reduction." However, enclosed with this response was a sworn affidavit provided by the State Party's former chairman. It states that the contribution "was inadvertently not designated at the time as being intended for the primary election campaign." (Attachment #4). Thus, because of the sworn evidence that the contribution, made after the date of primary was undesignated, it must be attributed to the general election. See former 11 C.F.R. § 110.1 (in effect at the time this contribution was made). Thus, the State Party accepted $5,500 in general election contributions. This violation, as well as the Committee's initial failure to report this contribution, is included in the attached, proposed conciliation agreement.

III. DISCUSSION OF CONCILIATION AGREEMENT AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Enter into conciliation prior to a finding of probable cause to believe with the Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer.

2. Approve the attached conciliation agreement and letter.

Date 7/1/88

Lawrence M. Noble
General Counsel

Attachments
1. Shimizu Committee's First Response
2. Shimizu Committee's Second Response
3. Check Copy
4. Shimizu Committee's June 2, 1988 Response
5. Proposed Letter
6. Proposed Concilation Agreement

Staff Person: Patty Reilly

0004078277 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/KAREN E. TRACHT
COMMISSION SECRETARY

DATE: JULY 5, 1988

SUBJECT: OBJECTION TO: MUR 2288 - GENERAL COUNSEL'S REPORT SIGNED JULY 1, 1988

The above-captioned document was circulated to the Commission on TUESDAY, JULY 5, 1988, at 11:00 A.M.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for JULY 12, 1988.

Please notify us who will represent your Division before the Commission on this matter.

0004078774

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	MUR 2288

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 12, 1988, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 2288:

1. Enter into conciliation prior to a finding of probable cause to believe with the Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer.

2. Approve the conciliation agreement and letter attached to the General Counsel's report dated July 1, 1988.

Commissioners Aikens, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner Elliott dissented; Commissioner McDonald was not present.

Attest:

7-13-88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

9004076275

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1988

K. Helen Oniki, Treasurer
Shimizu for Congress Committee
2977 East 7000 South
Salt Lake City, Utah 84121

RE: MUR 2288
Tom Shimizu for
Congress Committee
and K. Helen Oniki,
as treasurer

Dear Ms. Oniki:

On March 10, 1987, the Federal Election Commission found reason to believe that the Tom Shimizu for Congress Committee and you, as treasurer, violated 2 U.S.C. § 434(b)(2). Additionally, on December 10, 1987, the Commission found reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). At your request, on July 12, 1988, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

0004078277

RECEIVED
FEDERAL ELECTION COMMISSION
88 JUL 21 AM 9:20

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer	)	MUR 2288

SENSITIVE
EXECUTIVE SESSION
AUG 02 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("Federal Account") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a). 1/ On December 10, 1987, the Commission considered the respondents' request for pre-probable cause conciliation, determined that further discovery was warranted, and directed this Office to circulate additional questions for Commission approval. 2/ The Commission approved these interrogatories on January 27, 1988, and they were sent to the respondents on February 4, 1988.

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1/ At the time of this determination, the Commission's policy was that committees exceeding the limitations of 2 U.S.C. § 441a(d) violated that section. The Commission has changed this policy so that committees exceeding the limitations of section 441a(d) are determined to have violated 2 U.S.C. § 441a(f).

2/ The Commission's initial reason to believe determinations referred to the respondents as the Utah Republican Party Federal Account, as well as parenthetically as "the State Party." Because, as discussed at Section IIB, the respondents have made expenditures from their non-federal account, possible violations of 11 C.F.R. § 102.5(a)(1) and 2 U.S.C. § 441b by both the Non-Federal Account and Federal Account are presented. Therefore, we distinguish between the Non-Federal Account and the Federal Account in this report. The recommendation regarding possible section 102.5 and section 441b violations refers to the Utah Republican Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer.

The Federal Account requested and received an extension of time to respond until March 15, 1988. On March 21, 1988, this Office received the Federal Account's response which did not provide complete information to the Commission's interrogatories. After being contacted by this Office, the respondents agreed to file a supplemental response.

Subsequently, respondents obtained counsel who conferred with this Office regarding the costs of materials said to be volunteer materials. Counsel submitted a supplemental response on May 3, 1988. Additionally, on June 6, 1988, this Office received a second request for pre-probable cause conciliation from the Federal Account. As discussed below, in light of apparent violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.5, the possibility that the Federal Account made other expenditures that might be subject to the limitations of section 441a(d), and continued uncertainty regarding the amounts actually expended for alleged volunteer activity, this Office believes that the Commission should not enter into pre-probable cause conciliation at this time. Accordingly, this Office has attached additional questions for Commission approval.

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II. ANALYSIS OF RESPONSES

A. Additional Bases Of Excessive Section 441a(d) Spending

The Commission's determination that the respondents may have exceeded their section 441a(d) limit was based on an analysis

of two radio ads and two mailers. The mailers were identified as "You Can Tell" and "This Is the Door." The Federal Account's most recent response reveals that at least two other mailers were produced that may be subject to the limitation of section 441a(d).

Pursuant to 2 U.S.C. § 441a(d), state party committees are permitted to make general election expenditures on behalf of a candidate that do not exceed 2 cents multiplied by the voting age population of a state. The 1986 limitation for the House race in Utah was $21,810. An expenditure is subject to section 441a(d) if it is for the general election, notes a clearly identified candidate and contains an electioneering message. See A.O.s 1984-15 and 1985-14. An electioneering message includes both messages designed to urge the public to elect a certain candidate or party and messages containing express advocacy.

In the instant case, based upon the invoice provided in the Federal Account's March 14, 1988 response, this Office noted a printing invoice for a "Garn/Shimizu Letter." See Attachment Two, p.11. At the request of this Office, the State Party provided a copy of this letter with its April 25, 1988 response. See Attachment Three at pages 19 and 20. This letter, dated October 22, 1986, is addressed to "Fellow Utahn" from Senator Jake Garn. It states that "[w]hen you vote on Tuesday, November 4th, you will make two decisions that will greatly impact on my

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future." The letter requests voters to vote for Senator Garn and also requests that voters "help us by voting for Tom [Shimizu] on November 4th." The front of the mailer reads "On November 4th Elect An Important Team for Utah" and beneath this statement includes the names of Senator Garn and Tom Shimizu, notes the offices for which they are running and includes two checked boxes.

In the opinion of this Office, this letter represents a section 44la(d) expenditure, the costs of which should be allocated as one half for Senator Garn and one half for Tom Shimizu. The letter is clearly a general election expenditure; it specifically notes the date of that election and requests voters to vote on that day, both candidates are identified by name, the letter urges persons to cast their ballots for Tom Shimizu and Senator Garn, and its cover expressly advocates their election. Therefore, the mailer meets the requirements for a section 44la(d) expenditure. 3/

Additionally, the Federal Account's April 25, 1988 response at page 17 includes an invoice indicating the respondents may have made another section 44la(d) expenditure. Specifically, the invoice notes the Federal Account's mailer entitled "Tom Shimizu Red 1 + 1 Letter." This notation raises the inference that this mailer might

3/ The respondents assert that this mailer is exempt volunteer activity. As discussed in Section C, because of the inconsistent information provided by the respondents, this Office has attached additional questions for Commission approval.

also be subject to section 441a(d). The attached interrogatories and request for production of documents request a copy of this mailer.

B. Use Of Impermissible Funds

Based upon questions raised by this Office, the Federal Account's April 25, 1988 response states that disbursements for some of its alleged section 441a(d) expenditures were made from its state account ("the Non-Federal Account"). See, Attachment Three at p.2. Respondents state that these expenditures are represented by the invoices and checks at tabs 2 and 3 to this response and total $13,434.29. If all invoices and checks at these attachments represent disbursements paid from the state account, however, this amount would appear to be much higher. The checks and invoices included in this response are as follows:

	Vendor	Amount	Description
1.	Graphic Communications (check)	$3,823.11	?
2.	Graphic Communications (invoice)	$9,823.11	This is the Door Mailer You can Tell Mailer
3.	Progressive/Direct Mail (check)	$3,611.10	?
4.	Progressive/Direct Mail (invoice)	$3,025.55	5 mailers
	Total:	$20,282.87 4/	

4/ The April 25, 1988 response at pg.3 indicates the two invoices totalling $13,434.29 were paid from the state account. An invoice from Progressive Direct Mail has either not been provided or is incorrectly noted in this response. It may be that the respondents paid for these mailers with a number of checks, only two of which are included in the response. The attached interrogatories explore this issue.

0 0 4 0 7 0 3 7 8 4

Pursuant to 11 C.F.R. § 102.5(a), political committees conducting both state and federal activity must either accept only funds subject to the Act's prohibitions and limitations or establish a separate federal account that accepts only permissible funds. The Act establishes contribution limitations on individuals, 2 U.S.C. § 441a(a)(1)(A), and prohibits contributions from corporations and labor unions. 2 U.S.C. § 441b(a). Political committees are prohibited from accepting such corporate and union contributions. Id. Committees establishing a separate federal account must make all disbursements, contributions, expenditures, and transfers in connection with any federal election from the federal account. 11 C.F.R. § 102.5(a)(1)(i).

In the instant case, by the respondents' own admission that disbursements for a federal election were made from the state account, there is evidence to support a reason to believe finding of 11 C.F.R. § 102.5(a). Additionally, because the State of Utah permits state committees to accept contributions that would be prohibited under the Act, 2 U.S.C. § 441b may have been violated. Therefore, this Office recommends that the Commission find reason to believe the Utah Republican Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1) and inquire whether impermissible funds were contained in the account at the time of the disbursements made for federal elections.

0040786793

C. Inconsistent Information Provided By The Respondents

Respondents have an outstanding request for pre-probable cause conciliation that was recently reiterated. However, as discussed below, the inconsistent responses provided regarding the expenditures in question militate against entering such conciliation at this time.

1. The Radio Ads

The Federal Account's initial response to the complaint stated it paid $5,337.45 and $5,232.90 for the two radio ads in question. The invoices provided in the most recent response total $5,435.60 for the former ad. The respondents have not addressed this discrepancy in the response. 5/ The attached interrogatories and request explore this issue.

2. This Is the Door Mailer

Inconsistent information has been provided regarding the This Is the Door Mailer. The first response indicated that the mailing consisted of 77,211 pieces with $4,911.55 for printing; $772.11 for labeling; and $3,783.34 for postage at a total cost of $9,467.00. The March 14, 1988 response included an invoice for postage for this mailing. The invoice indicates that the mailing was 66,331 pieces and that $4,716.60 was paid for postage. The April 25, 1988 response restates the original amounts for printing and mailing, but an invoice from the printing company states that 75,600 pieces were printed.

5/ The invoices for the latter ad indicate the Federal Account provided correct information regarding its costs.

Moreover, an invoice provided from the printing company that bundled and labeled this mailer indicates that 77,211 were processed. The responses have not addressed these inconsistencies, and thus this issue is included in the attached questions.

3. You Can Tell Mailer

Inconsistent information has also been provided regarding the other mailer entitled "You Can Tell." 6/ The first response indicated that this mailing consisted of 118,933 pieces, with $7,957.15 for printing, $1,214.33 for labeling and $5,827.72 for postage. The text of the March 14, 1988 response stated that $8,666.21 was spent on printing and related services. The only evidence of postage paid in this response was a postal invoice indicating $2,757.98 had been expended for 38,834 pieces of mail. This response also included an invoice provided from the printing company indicating that 48,000 mailers had been printed at a cost of $2,880 (excluding tax). This information changed as a result of the State Party's April 25, 1988 response. This response stated that the printing cost figure was in error, and that this figure was actually $4,716.60. An invoice from the mailing company also indicates that 118,933 pieces were processed and the labeling costs were $1,214.33. Other than to explain the discrepancy as to the difference in the printing costs in the

6/ Respondents also refer to this mailer as "The Company He Keeps." The mailer noted that "You Can Tell a Man By the Company He Keeps."

0040727

first and second responses, the Federal Account has not addressed these discrepancies. 7/

4. Other Factual Concerns

Two other related factual concerns remain outstanding regarding the roles played by the volunteers in this matter. The initial response stated that 240 volunteers handled 196,144 total pieces of mail at an average of 818 pieces of mail per person. However, as indicated by the most recent response, the Shimizu/Garn letter was also said to be volunteer activity. The question thus arises whether the other mailings noted on the invoice of the March 14, 1988 response were also mailers that the volunteers worked on. If so, the volunteers may have processed more mail than believed, but, because these other mailers may be legitimate party building materials, only a portion would be relevant to volunteer activity related to the State Party's 441a(d) limit for the 1986 House Race. The attached questions explore this issue.

An additional concern looks to the activities actually performed by the volunteers. The first response noted that "the volunteers handled each piece of mail individually by stamping our non-profit organization mail permit up in the right hand corner of the mail piece. The piece was then bundled ready for labeling from the ... party developed list." Attachment One, p. 13. The Commission's most recent interrogatories to

7/ The Federal Account explained that the figure from the second response was taken from the total of the invoice at p.11 of the March 14, 1988 Response without recognizing that only $2,880 of this amount was paid for the mailer, and that the other amounts were for unrelated materials. A second invoice included the rest of the printing costs for the You Can Tell Mailer.

0004027895

respondents sought detailed information regarding volunteer activity for the This Is the Door and You Can Tell Mailers, including the names of the vendors used in the preparation of the mailings. The March 14, 1988 response noted only Communications Graphics as a vendor. The April 26, 1988 response, however, includes an invoice from Progressive Direct Mail Advertising, a company utilized by the respondents. The invoice notes all the mailers said to be volunteer activity were labeled, sorted, and received bulk mail handling. Additionally, the You Can Tell Mailer received "bulk mail handling with set up." It thus appears the volunteers' roles were limited solely to stamping on the non-profit mail seal. The attached questions seek information regarding any other activities performed by the volunteers regarding the mailings.

III. ADDITIONAL BASIS SUPPORTING A VIOLATION OF 2 U.S.C. § 441a

As previously noted, the Commission's reason to believe findings encompassed a possible violation of 2 U.S.C. § 441a stemming from excessive section 441a(d) expenditures. Additionally, the Commission further determined that the other respondent in this matter, the Shimizu Committee, violated 2 U.S.C. §§ 441a(f) and 434(b)(2) regarding its possible receipt and failure to report an excessive general election contribution made by the State Party. 8/

8/ On December 10, 1987, the Commission considered the Federal Account's request for pre-probable cause conciliation and determined not to grant it at that time. The General Counsel's Report at pgs. 13-14 discussed the Federal Account's apparent excessive contribution and proposed notifying them that this was an additional basis for the Commission's determination of a possible violation of 2 U.S.C. § 441a. Because the Commission determined further discovery was warranted, the respondents were not notified regarding the additional basis of this violation at that time. Consistent with that report, we are now informing respondents of the additional factual information supporting this violation of section 441a.

0004078287

The investigation conducted reveals the Federal Account reported making a $500 general election contribution to the Shimizu Committee on October 9, 1986, and a $5,000 general election contribution to the Shimizu Committee on October 27, 1986. Thus, an excessive contribution appeared to have been made. 9/

On January 26, 1988, following notification of a possible violation of section 441a(f), the Shimizu Committee submitted a second response explaining that they had received a $500 check from the State Party in October, 1986, and that this check was intended for primary debt retirement. The Shimizu Committee then amended its reports accordingly.

Because the Shimizu Committee did not provide any evidence regarding the designation of this contribution, this Office requested a copy of the check. After a search the Shimizu Committee located a copy and provided it to this Office on May 9, 1988. The check indicates a handwritten notation "Other Pol. Party FOR PRIMARY." However, because this Office had conversations with the treasurer that indicated that the check was undesignated, it appeared this designation was written by the treasurer to assist this Office in identifying the check. Upon further inquiry by this Office, by letter dated June 2, 1988, the Candidate stated that this $500 contribution was given with the

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9/ On January 28, 1988, the State Party amended its 1988 Pre-General Election Report to change the designation of this $500 contribution from the general to the primary election. The Commission subsequently determined to enter into pre-probable conciliation with the Shimizu Committee.

0040727798

"clear understanding that it was for primary debt reduction." However, enclosed with this response was a sworn affidavit provided by the State Party's former chairman. It states that the contribution "was inadvertently not designated at the time as being intended for the primary election campaign." Thus, because of the sworn evidence that the contribution, made after the date of primary, was undesignated, it must be attributed to the general election. See former 11 C.F.R. § 110.1 (in effect at the time these contributions were made). Thus, the Federal Account accepted $5,500 in general election contributions, an amount exceeding the Act's $5,000 limitation at 2 U.S.C. § 44la(a)(1)(C). The attached proposed letter, as well as the factual and legal analysis, informs the Federal Account of the additional basis of a possible violation of 2 U.S.C. § 44la.

0004078279

IV. RECOMMENDATIONS

1. Find reason to believe the Utah Republican State Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1).

2. Approve the attached letter, factual and legal analysis, and Interrogatories and Request for Production of Documents.

Lawrence M. Noble
General Counsel

Date 7/20/88

Attachments
1. First Responses (4/17/87 and 5/26/87)
2. Second Response (3/14/88)
3. Third Response (4/25/88)
4. Shimizu Committee's June 2, 1988 Response
5. Proposed Letter
6. Interrogatories and Request for Production of Documents (without attachments)
7. Factual and Legal Analysis (without attachment)

Staff Person: Patty Reilly

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: JULY 25, 1988

SUBJECT: OBJECTION TO MUR 2288 - General Counsel's Report Signed July 20, 1988

The above-captioned document was circulated to the Commission on Thursday, July 21, 1988 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	
Commissioner Elliott	X
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the Executive Session agenda for August 2, 1988.

Please notify us who will represent your Division before the Commission on this matter.

0004076279 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer	)	MUR 2288

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 2, 1988, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 2288:

1. Find reason to believe the Utah Republican State Party (Federal Account/Non-Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1).

2. Approve the letter, factual and legal analysis, and Interrogatories and Request for Production of Documents as recommended in the General Counsel's report dated July 20, 1988.

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

Attest:

8/2/88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

0004078270

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	
	MUR2288
Utah Republican Party (Federal Account/Non-Federal Account and Michael Jones, as treasurer	

GENERAL COUNSEL'S REPORT

On August 2, 1988, the Commission considered the General Counsel's Report in the above-captioned matter and determined that there was reason to believe respondents violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). At the table, this Office noted that the Committee had changed its treasurer and that the recommendations should refer to the Committee's treasurer as Michael Jones. Upon receipt of the certification, however, it was noted that the reason to believe finding named the former treasurer. This Office contacted the Office of the Commission Secretary to correct this matter. We were informed that because no motion had been made specifically amending the treasurer's name, the certification could not be altered without a vote by the Commission. Accordingly, in order that the certification may reflect the Commission's intent, this Office recommends that the Commission substitute the name of Michael Jones in the reason to believe finding.

RECOMMENDATION

1. Substitute the name of Michael Jones as the respondent treasurer in the Commission's certification in this matter dated August 2, 1988.

8/9/88
Date

Lawrence M. Noble
General Counsel

Staff Person: Patty Reilly

Attachment
1. Certification

88 AUG -9 PM 4:13
FEDERAL ELECTION COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael Jones, as treasurer	)	MUR 2288
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 12, 1988, the Commission decided by a vote of 6-0 to substitute the name of Michael Jones as the respondent treasurer in the Commission's certification in this matter dated August 2, 1988, as recommended in the General Counsel's report signed August 9, 1988.

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

Attest:

8/12/88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 8-9-88, 4:13
Circulated on 48 hour tally basis: Wed., 8-10-88, 11:00
Deadline for vote: Fri., 8-12-88, 11:00

0004078279 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

H. Dickson Burton, Esquire
Watkiss & Campbell
310 South Main Street
Salt Lake City, Utah 84101-2171

RE: MUR 2288
Utah Republican Party
(Federal Account/Non-Federal Account) and
Michael Jones, as
treasurer

Dear Mr. Burton:

On March 10, 1987, your clients, the Utah Republican Party, (Federal Account) and its treasurer, ("the Federal Account") were notified that the Federal Election Commission had found reason to believe they violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6) and 441d(a), provisions of the Federal Election Campaign Act of 1971, as amended.

Additionally, based on the responses in this matter, on August 2, 1988, the Commission found reason to believe the Utah Republican Party (Federal Account/Non-Federal Account) and Michael Jones, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). Moreover, based upon a possible excessive contribution made by the Federal Account to the Shimizu Committee it appears there is an additional basis for the Commission's previous determination that your clients violated 2 U.S.C. § 441a. The Factual and Legal Analysis which formed the basis of the Commission's most recent finding, and which explains the additional basis supporting the previous determination of a possible violation of 2 U.S.C. § 441a, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials along with your response to the enclosed interrogatories and request for production of documents. All responses must be submitted within 15 days of your receipt of this request. Statements should be submitted under oath.

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The Commission also notes that your clients have an outstanding request for pre-probable cause conciliation. Because of the need to further develop the facts of this matter, the Commission cannot enter into such conciliation at this time. After reviewing your responses to this request for information, your request will be reconsidered.

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

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

This matter will remain 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.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Danny Lee McDonald

Danny Lee McDonald
Vice Chairman

Enclosures
Interrogatories and Request for Production
Factual and Legal Analysis

0004073279

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2288
Shimizu for Congress Committee)
and K. Helen Oniki, as treasurer)

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GENERAL COUNSEL'S REPORT

On March 10, 1987, the Commission found reason to believe the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, ("the Committee") violated 2 U.S.C. § 434(b)(2). Additionally, on December 10, 1987, the Commission found reason to believe the Committee violated 2 U.S.C. § 441a(f). Pursuant to the Committee's request, on July 12, 1988, the Commission determined to enter into conciliation negotiations prior to a finding of probable cause to believe. Respondents were notified of this determination by letter dated July 18, 1988.

This Office and respondents are currently engaged in conciliation negotiations and do not appear to be far from an acceptable agreement. Because the thirty day period for pre-probable cause conciliation will soon expire, this Office will extend negotiations for an additional fifteen days. At the conclusion of this period, this Office will report to the Commission.

8/11/88
Date

Lawrence M. Noble
General Counsel

Staff Person: Patty Reilly

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88 AUG 29 AM 10: 37

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ZAR E. HAYES
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TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3892

WRITER'S DIRECT NUMBER:

August 26, 1988

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

Re: Utah State Republican Party
MUR 2288

88 AUG 29 PM 12: 32

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Patty:

This is to confirm that we are in receipt of the letter of August 19, 1988 from Vice Chairman Danny Lee McDonald along with the additional Interrogatories. These materials were received by this office on August 23, 1988. We will be responding forthwith.

Mr. McDonald stated in his letter that pursuant to 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) this matter will remain confidential unless we request otherwise in writing. We wish to confirm that it is understood that this matter is to and will be treated with complete confidentiality as required by statute, and to that end, we demand the same.

I will be talking with you in the near future.

Very truly yours,

Robert S. Campbell Jr.

ROBERT S. CAMPBELL, JR.
H. DICKSON BURTON
WATKISS & CAMPBELL

Attorneys for Utah State Republican Party

RSC:pm

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88 SEP -1 AM 11:01

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(801) 350-3892

WRITER'S DIRECT NUMBER:

August 31, 1988

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

Re: MUR 2288

Dear Mr. Anderson:

This office represents the Utah State Republican Party in the above-referenced investigation. Patty Reilly of your office is handling the investigation, and in her absence I am instructed to direct this request to your attention. We received Interrogatories and Request for Production of Documents from your office on August 23, 1988. By our calculations, our answers are currently due on September 7, 1988. We hereby request a twenty (20) day extension of time in which to answer the Interrogatories and Request for Production of Documents.

The reasons for this request are that the Interrogatories address matters that took place nearly two years ago while the Utah State Republican Party was under the direction of different officers and had different employees. It also involves the campaign organization of Tom Shimizu which has long since been disbanded. While this investigation has been on-going since 1986, your Interrogatories and Requests seek documents that have not yet been identified by my client and seek clarification and explanation of earlier responses. In order to make a thorough search to confirm the existence or non-existence of documents, and to assess information as it pertains to your investigation, additional time will be needed.

88 SEP -1 PM 1:04

FEDERAL ELECTION COMMISSION

Further, several key individuals who have knowledge of the matters in question and who provided earlier responses, including the former Executive Director of the State Party, Greg McDonough, are no longer employed by the Party. It is necessary to interview them in order to fully and accurately respond to the Interrogatories and Requests. While he has since moved back to Utah, Mr. McDonough was until very recently employed in Arizona. With his new employment responsibilities and with the Labor Day holiday weekend falling immediately prior to the current due date of our answers, it is difficult to coordinate schedules between the various individuals involved.

Therefore, in order to fully and accurately respond to the Interrogatories and Request for Production of Documents, it will be necessary to have an extension of time. We request an extension of twenty (20) days, which will make our responses due by September 27, 1988.

I look forward to your response as soon as possible.

Very truly yours,

H. DICKSON BURTON

HDB:pm

0 0 1 4 3 7 3 7 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 15, 1988

H. Dickson Burton, Esquire
Watkiss & Campbell
310 South Main Street
Salt Lake City, Utah 84101-2171

RE: MUR 2288
Utah Republican Party
(Federal Account/Non-Federal Account) and Michael Jones, as treasurer

Dear Mr. Burton:

The Office of the General Counsel is in receipt of your request for an extension of time to respond to the Commission's interrogatories and request for production of documents in the above-captioned matter. After reviewing the circumstances as detailed in your letter, this Office will grant the requested twenty day extension. Accordingly, your response is due no later than September 27, 1988.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #4

On August 2, 1988, the Commission approved interrogatories and a request for production of documents to the respondents in the above-captioned matter. On August 31, 1988, respondents' counsel met with staff to discuss the scope of the Commission's subpoena. Subsequently, on that date, respondents submitted a written request for a twenty day extension of time to respond, citing the press of the Labor Day Holiday and the need to contact various individuals in order to obtain information. Under these circumstances, this Office granted the requested extension until September 27, 1988. After receiving and evaulating this response, this Office will report to the Commission.

9/20/88
Date

Lawrence M. Noble
General Counsel

Staff Person: Patty Reilly

0004072

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[redacted] [redacted] CEIVED
FEDERAL ELECTION COMMISSION

88 SEP 28 AM 9:45

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OF COUNSEL
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RICHARD B. FERRARI

TELEPHONE
(801) 363-3300

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(801) 350-3892

WRITER'S DIRECT NUMBER:

September 26, 1988

VIA FEDERAL EXPRESS

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

88 SEP 29 PM 1:08

FEDERAL ELECTION COMMISSION
RECEIVED
OFFICE OF GENERAL COUNSEL

Re: Utah State Republican Party
MUR 2288

Dear Patty:

Confirming our telephone conversation of today, as counsel for the Utah State Republican Party, we hereby request an additional extension of time to answer the FEC's interrogatories in the above-referenced investigation for 30 days, to and including October 27, 1988. This extension is necessary because of an independent audit by Peat Marwick Main & Co. that I have requested of the federal expenditures during the 1986 campaign cycle by the State Party, particularly out of the non-federal account.

The audit will be conducted in accordance with accepted auditing procedures as provided by the Institute of Certified Public Accountants. It will provide a comprehensive evaluation of all expenditures during the 1986 campaign cycle from the Non-Federal Account that were directed towards federal elections.

We will be meeting with the accountants later this week in order to get an estimated time for completion of the audit. We anticipate, however, that thirty days will be sufficient. We appreciate your cooperation.

Very truly yours,

Robert S. Campbell Jr.

ROBERT S. CAMPBELL, JR.
H. DICKSON BURTON
WATKISS & CAMPBELL
Attorneys for Utah State
Republican Party

RSC:crm

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Utah Republican Party (Federal) MUR 2288
Account/Non-Federal Account))
and Michael L. Jones, as)
treasurer)

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("Federal Account") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6)(B)(iv) and 441d(a). */ On December 10, 1987, the Commission considered the respondents' request for pre-probable cause conciliation, determined that further discovery was warranted, and directed this Office to circulate additional questions for Commission approval. The Commission approved these interrogatories on January 27, 1988, and they were sent to the respondents on February 4, 1988.

The Federal Account requested and received an extension of time to respond until March 15, 1988. On March 21, 1988, this Office received the Federal Account's response which did not provide complete information to the Commission's interrogatories. After being contacted by this Office, the respondents agreed to file a supplemental response.

Subsequently, respondents' obtained counsel who conferred with this Office regarding the costs of materials said to be

*/ At the time of this determination, the Commission's policy was that committees exceeding the limitations of 2 U.S.C. § 441a(d) violated that section. The Commission has changed this policy so that committees exceeding the limitations of section 441a(d) are determined to have violated 2 U.S.C. § 441a(f).

volunteer materials. Counsel submitted a supplemental response on May 3, 1988. Additionally, on June 6, 1988, this Office received a second request for pre-probable cause conciliation from the Federal Account.

On August 2, 1988, the Commission considered the Federal Account's request for pre-probable cause conciliation and determined not to grant it. Additionally, on August 2, 1988, based on information uncovered during the course of the investigation, the Commission found reason to believe the Utah Republican State Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). Also on this date, the Commission approved interrogatories and a request for a production of documents. Following a substitution of the name of the treasurer on the Commission's certification, these materials were mailed to respondents on August 14, 1988.

II. EXTENSION REQUESTS

On August 31, 1988, respondents' counsel met with staff to discuss the scope of the Commission's subpoena. Subsequently, respondents submitted a request for a twenty day extension of time, citing the press of the Labor Day holiday and the need to contact former members of the campaign. Under these circumstances, this Office granted this twenty day extension of time and so notified the Commission.

Following conversations with this Office, on September 28, 1988, respondents submitted the attached second extension of time request. In support of this second extension, respondents explain that after an initial review of the books of the state and federal accounts, possible irregularities have come to light. Specifically, respondents have cited the use of state account funds for federal election expenditures. Respondents state they have hired an accounting firm to audit the two accounts and to identify all federal expenditures made from the non-federal account during the 1986 election cycle. In order to complete this review, respondents thus request an extension of time until October 27, 1988.

This Office recommends that the Commission grant the requested extension in order that the internal audit may be completed. As noted in the General Counsel's Report dated July 20, 1988, the responses received to date have produced numerous inconsistencies regarding respondents' alleged section 441a(d) expenditures that the internal audit may resolve. Additionally, respondents' cooperation in this matter will aid this Office in analyzing the nature and extent of possible violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.5. Therefore, this Office believes an extension of time is appropriate.

III. RECOMMENDATIONS

1. Grant a thirty day extention of time to the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer.

0040782803

2. Approve the attached letter.

10/12/98
Date

Lawrence M. Noble
General Counsel

Attachments
1. Extension Request
2. Proposed Letter

Staff Person: Patty Reilly

20040078206

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 14, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2288:

1. Grant a thirty day extension of time to the Utah Republican Party (Federal Account/ Non-Federal Account) and Michael L. Jones, as treasurer, as recommended in the General Counsel's report signed October 12, 1988.

2. Approve the letter, as recommended in the General Counsel's report signed October 12, 1988.

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

Attest:

Oct. 14, 1988
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 10-12-88, 2:16
Circulated on 48 hour tally basis: Wed., 10-12-88, 4:00
Deadline for vote: Fri., 10-14-88, 4:00

0004078207

plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1988

Robert Campbell, Esquire
Watkiss & Campbell
310 South Main Street
Salt Lake City, Utah 84101-2171

RE: MUR 2288
Utah Republican Party
(Federal Account/Non-Federal Account) and
Michael L. Jones,
as treasurer

Dear Mr. Campbell:

On October 14, 1988, the Commission considered your request for a thirty day extension of time to respond to the Commission's subpoena in the above-captioned matter and determined to grant it. Accordingly, your response is due no later than October 27, 1988.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

0004078208

06 C #825
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES
WATKISS & CAMPBELL
A PROFESSIONAL CORPORATION
TWELFTH FLOOR
310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

88 OCT 29 AM 10:03

DAVID K. WATKISS
ROBERT S. CAMPBELL, JR.
JAMES P. COWLEY
HERSCHEL J. SAPERSTEIN
H. WAYNE WADSWORTH
WILLIAM VOGEL
PHILIP C. PUGSLEY
GLEN E. DAVIES
ROBERT D. MAACK
MICHAEL F. HEYREND
GREGORY B. MONSON
ALLAN T. BRINKERHOFF
WESTON L. HARRIS
E. BARNEY GESAS
LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
D. RANDALL TRUEBLOOD
VINCENT C. RAMPTON
JOSEPH T. DUNBECK, JR.
TRACY H. FOWLER
R. L. KNUTH
DENNIS J. CONROY
STEVEN T. WATERMAN
KEN P. JONES
DEBRA J. MOORE
CASS C. BUTLER
H. DICKSON BURTON
DANIEL J. TORKELSON
GEORGE T. WADDOUPS
MARTIN R. DENNEY
STEVEN E. McCOWIN
CAROLYN COX
WILLIAM H. CHRISTENSEN
CASEY K. McGARVEY
C. SCOTT BROWN
BRETT F. WOOD
LESLIE J. RANDOLPH
LAWRENCE R. DINGIVAN
ZAR E. HAYES
RICHARD B. FERRARI

TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3892

WRITER'S DIRECT NUMBER:

October 27, 1988

88 OCT 31 PM 1:40

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

Re: Utah State Republican Party
MUR 2288

Dear Patty:

Enclosed please find our responses to your Interrogatories and Requests for Production of Documents served August 23, 1988. As we have discussed in previous telephone conversations and correspondence, we have uncovered additional information in our investigation to answer these interrogatories. As a result, we decided to retain the accounting firm of Peat Marwick Main in order to review all expenditures made by the Utah State Republican Party from July 1, 1986 through December 31, 1986 in order to determine whether any additional expenditures were made that may have been improper under federal campaign financing laws.

As our answers to the Interrogatories will show, we have discovered additional expenditures for postage made out of the Non-federal Account which were not previously identified. Further, we have identified certain expenditures made for a mailer and a newspaper insert on behalf of Congressman Jim Hansen's 1986 campaign for the First Congressional District for the State of Utah, and for a voter identification phone bank, of which as much as one-half should be allocable to federal candidates.

The mailer for Congressman Hansen was entitled "Is There Really A Difference?" (Attached as Exhibit 1.) The expenditures were as follows:

Description	Cost
Hurst Jarrard (Art work, layout, etc.	$ 356.00
Hurst Jarrard (Printing)	$ 3,242.00
Progressive Direct Mail	$ 434.84
Postage	$ 4,161.87

The invoices and checks for Hurst Jarrard and postage are attached as Exhibit 2 to this letter. The Progressive Direct Mail expenses listed in the Progressive Direct Mail invoice are attached as Exhibit B to the Answers to the Interrogatories. All of these expenditures were made out of the Non-federal Account.

In addition to this mailer, there was also a newspaper insert produced on behalf of Jim Hansen, printed by Hurst Jarrard & Company at a cost of $350.44. This amount was also paid out of the Non-federal Account. The invoice is attached as Exhibit 3 to this letter.

We have also identified certain expenses with regard to voter identification phone banks. These expenses total $32,651.22. However, as shown by the sample voter I.D. survey script attached hereto as Exhibit 4, only two of the five questions deal with candidates for federal office.[1] Additional questions also addressed a County Commission race and inquired as to party identification. Therefore, no more than 50% of the costs of the voter identification phone banks could fairly be attributed federal campaign expenses or was $16,325.61, all paid out of the Non-federal Account. However, these expenditures were reimbursed by the National Republican Senatorial Committee and Senator Jake Garn out of checks totalling $64,425.00. (Attached hereto as Exhibit 4). These contributions were intended for phone bank purposes, as well as other federal campaign expenditures, although they were inadvertently deposited into the Non-federal Account.

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[1]The script attached identifies Howard Nielson, a candidate for the Third Congressional District for the State of Utah. It is believed that similar scripts were used in the First and Second Congressional Districts.

It appears from the foregoing and from the Answers to Interrogatories submitted herewith that on several occasions during the 1986 campaign cycle, certain State Party employees acted either inadvertently or in ignorance of how the federal and non-federal accounts were to operate. However, it is also evident that there was no deliberate attempt to circumvent the law since there was no need to do so. As can be seen from the evidence of source of funds provided in response to Interrogatory No. 2(c) (and Exhibit 4 to this letter), at least $64,425.00 of funds that would qualify for federal campaign expenditures under federal law, was deposited in the Non-federal Account. Checks were then inadvertently or ignorantly cut from the Non-federal Account for federal campaign expenditures.

Except for the items already under investigation and the items described above, the procedures performed by Peat Marwick Main revealed no other improper expenditures during the time period of the audit, July 1, 1986 to December 31, 1986. A copy of Peat Marwick Main's report is enclosed herewith.

You should also know, while it isn't necessarily relevant to this investigation, that the Party has instituted very strict procedures governing current use of the Federal and Non-federal Accounts. For instance, the State Party Treasurer has received extensive training in Federal Campaign Financing laws and all checks must now be signed by him.

We trust that the information provided herein and in the Answers to the Interrogatories and Requests for Production of Documents is thorough and fully responds your inquiries. Nevertheless, if you have further questions or require additional information, please let me know.

Very truly yours,

H. Dickson Burton

HDB:mf

0 0 0 4 0 7 6 2 8 1 2

EXHIBIT 1

Utah State Republican Party
643 E. 400 S.
Salt Lake City, Utah 84102

...ROFIT ...
...Posta...
P.AID
...ke City, ...
...mit No. 1

Return to Sender
Addressee Unknown

ROBERT BECKRALL
1301 [illegible]
OGDEN, UT 84409

"IS THERE REALLY A DIFFERENCE?"

REPUBLICAN JIM HANSEN VS. DEMOCRAT GUNN MCKAY:

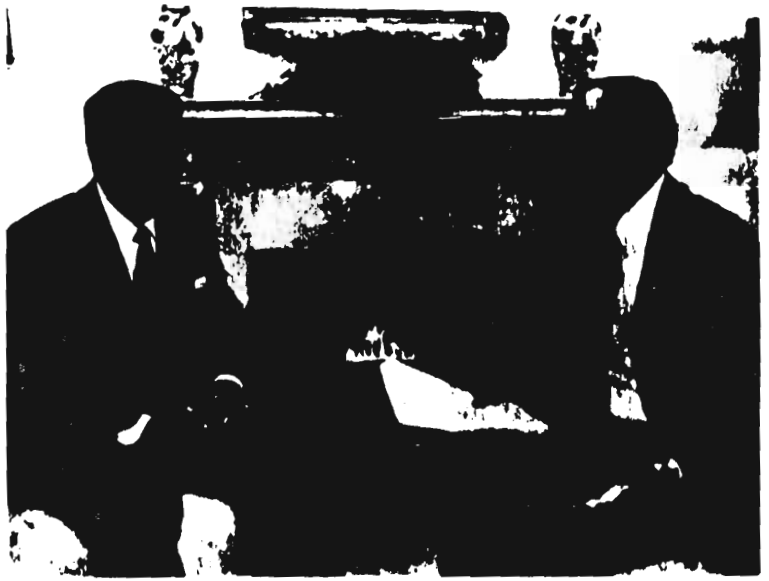
People often ask, "is there really a difference between the two candidates for Congress?" The comparison below shows that there is in fact a large difference between the candidates. Since both candidates have served in Congress, all we have to do is compare their records:

Issue:	Jim Hansen, Republican	Gunn McKay, Democrat	The Records:
1. A SUPPORTER OF PRESIDENT REAGAN?	**YES**	**NO**	**Jim Hansen:** "I support President Reagan in Congress because he supports the issues that are right for America and right for Utah." **Gunn McKay:** "Mondale had the issues, but Reagan had the personality and got the votes" (June 1, 1986 Deseret News). Forty-nine states and 78% of those in the First District of Utah disagree with Mr. McKay.
2. A CONSISTENT "WATCHDOG OF THE TREASURY"?	**YES**	**NO**	**Jim Hansen** has won the "Golden Bulldog" from the non-partisan group "The Watchdogs of the Treasury" every year. His rating from that group is a near perfect 99%. **Gunn McKay** won the "Golden Bulldog" only twice in his long career. His rating from the "Watchdogs of the Treasury" was a low 49%.
3. VOTES	H I 8 7 9 2 0 F U C o		

AGAINST RAISING THE NATIONAL DEBT?	YES	NO	**Jim Hansen** has voted against all 6 Debt Limit Increase Laws passed while he has been in Congress. **Gunn McKay** voted for all 14 Debt Limit Increase laws that were passed when he was in Congress.
4. VOTES FOR A BALANCED BUDGET?	YES	NO	**Jim Hansen** has voted consistently for balanced budget proposals that have come before the Congress. He is also a key supporter of the Balanced Budget Amendment effort. **Gunn McKay** voted against the 16 of the 21 balanced budget proposals that came before the Congress when he was there.
5. VOTES IN FAVOR OF SMALL BUSINESS INTERESTS?	YES	NO	**Jim Hansen** has been a consistent supporter of small business, the backbone of our economy. He has received a very high 86% rating and the campaign **endorsement** from the United States Chamber of Commerce; and a near non-existent 5% rating from the AFL-CIO. **Gunn McKay** has been a very weak supporter of small business, getting a feeble 55% rating from the United States Chamber of Commerce; and an alarming 57% score from the AFL-CIO—higher than his Chamber score.
6. FIGHTS TIP O'NEILL AND HIS LIBERAL POLICIES?	YES	NO	**Jim Hansen** has voted against Tip O'Neill every time he ran for Speaker of the United States House of Representatives. He has instead supported President Reagan in 76% of his votes. **Gunn McKay** voted for Tip O'Neill every time he ran for Speaker of the United States House of Representatives. He voted the same way Tip voted 80% of the time. Gunn even brought his good friend Tip O'Neill out to Utah to campaign for him!

Paid for by the Utah State Republican Party

0 0 0 4 0 7 8 2 8 1 6



PRESIDENT REAGAN WITH CONGRESSMAN JIM HANSEN

Discussing One of Jim's Bills at the Oval Office in the White House



Photo by Barbara Bernstein 1980

TIP O'NEILL WITH GUNN MCKAY

Gunn Brought Tip Out to Utah to Campaign For Him in 1980

There is **also** a difference in who the candidates can work with to get things done for Utah. Jim Hansen has worked on behalf of Utah with President Reagan, Vice-President Bush, Secretary of Defense Weinberger, Secretary of Interior Hodel, Senator Garn, Senator Hatch and the others who have been helping **solve** America's problems. Gunn McKay's influence would be limited to the Democrats in the House—the liberal, out-of- touch obstructionists who are part of America's **problem** in Washington.

THERE REALLY IS A DIFFERENCE BETWEEN JIM HANSEN AND GUNN MCKAY.

VOTE JIM HANSEN ON NOVEMBER 4TH

9 0 0 4 0 7 8 2 8 1 7

EXHIBIT 2

U.S. Postal Service

STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL: Complete all items by typewriter, pen or indelible pencil. Prep[illegible]plicate if receipt is desired. Check for instruction[illegible] your po[illegible]ter regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		

Class — 4th Class

- ☐ International
- 1st Class
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece
- ☐ Newspapers and magazines entered at the applicable third-class rate
- 3rd Class
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)

- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0250 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
43484	1087	59			9

Name and Address of Permit Holder (Include ZIP Code)

Jim Hansen
Utah State Republican Party
[illegible] East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

		No. Pounds / No. Qual. Pieces / No. of Pieces	Rate/Pound / Rate Per Piece	Postage
Pound Rate	1. Pound Rate Postage Charge		$	
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7. Basic	No. Qual. 43015	Rate Per [illegible] .071 $	Postage 3054.07
	8. Rate Category	No. of Pieces 469	Rate Per [illegible] .085 $	Postage 39.87
	9. SUBTOTAL (1 through 8)			Postage
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage 3093.94

11. ☐ Check if applicable [illegible] this bulk piece rate is paid by meter. (Form 3602 PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable → Total Postage $ 3093.94

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp

Signature of Weigher

Time
A.M.
P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-[illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. [illegible]

10/24/86

SLC, UT 84199-9519 PERMIT NO. 1063

FINANCE # 49-7786 UTAH REPUBLICAN PARTY
(P.S.M.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	NUMBER OF PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
59	0	3	3RD	0.305000	41.47	43484	1047.9[illegible]

PER PIECE CHARGE FOR 5 DIGIT PRESORT	$3054.07	43015 PIECES AT 0.07[illegible]
BASIC RATE RESIDUAL PIECES CHARGE	$39.87	469 PIECES AT 0.0[illegible]
TOTAL POSTAGE FOR MAILING	$3093.94	

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS [illegible]
(MAY NOT INCLUDE LATEST DEPO[illegible]

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2603

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUI[illegible] 801-533-9777
04/73 SALT LAKE CITY, U[illegible]4102

ZIONS FIRST NATIONAL BANK
First South Office
102 South [illegible]
Salt Lake City, [illegible]01

4957

10/10 1986

31-6
1240

PAY Three Thousand Two Hundred Forty Two and 00/100---------- DOLLARS $ 3,242.00

TO THE ORDER OF
Hurst Jarrard and Company
428 South State St.
Salt Lake City, UT 84111

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
	Jim Hansen Comparison Piece 908			

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHHOLDING U S INC TAX	SDI	STATE INCOME TAX			

Thank you!!

Terms: Full payment of charges is due upon receipt of invoice unless otherwise indicated above.
A finance charge of 2% per month (24% annual) interest will be added to such accounts which are not paid within 30 days of receipt of invoice. Accounts which extend over 90 days will be processed for collection. In the event that this account becomes delinquent and it becomes necessary to make collection, the client hereby agrees to pay all collection costs, reasonable attorneys fees and court costs. No claim for adjustment may be made after 10 working days from receipt of this invoice.

405

INVOICE

HURST
JARRARD
AND
COMPANY

428 South State St. / Salt Lake City, Utah 84111 / (801) 364-2930

Utah State Republican Party

Date: October 10, 1986

Please remit the following for expenses incurred in behalf of Jim Hansen for Congress by Hurst Jarrard & Co.:

PRINTING

Jim Hansen Comparison Piece: $3,242.00

Thank you!!

Terms: Full payment of charges is due upon receipt of invoice unless otherwise indicated above.
A finance charge of 2% per month (24% annual) interest will be added to such accounts which are not paid within 30 days of receipt of invoice. Accounts which extend over 90 days will be processed for collection. In the event that this account becomes delinquent and it becomes necessary to make collection, the client hereby agrees to pay all collection costs, reasonable attorneys fees and court costs. No claim for adjustment may be made after 10 working days from receipt of this invoice.

UTAH REPUBL[illegible] PARTY
643 EAST 400 SOUTH SUI[illegible] 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST N[illegible] BANK
First Se[illegible]
102 So[illegible]
Salt Lake City, Utah 84101

5034

Oct. 30 19 86

31-5
1240

PAY Three Hundred Fifty Six and No/100 Dollars---------- DOLLARS $ 356.00

Hurst Jarrard

TO THE ORDER OF

Judith W. Parker

NOT NEGOTIABLE

⑈124000054⑈ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
	Hansen Mailéer			

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	SDI	STATE INCOME TAX			

⑆000400708⑆

Tim Hanson 9 x 12 Broch

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAILER: Complete all items by typewriter, pen or indelible pencil. Pr[illegible]plicate if receipt is desired. Check for instruct[illegible] your po[illegible]ster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-15-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☑ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☐ 5-digit
- ☐ Basic
- ☐ Single Piece

both

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0285 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
58563	1435	39			3

Name and Address of Permit Holder (Include ZIP Code)

Telephone No. 972-8288

Utah state Republican Party
643 East 400 South
Salt Lake City, Utah 84102

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

		No. Pounds / No. Qual. Pieces / No. of Pieces	Rate/Pound / Rate Per Piece	Postage
Pound Rate	1. Pound Rate Postage Charge		$	
Piece Rates	2. ZIP + 4 Presort		$	
	3. Presort First Class		$	
	4. ZIP + 4 Nonpresort		$	
	5. Carrier Route		$	
	6. 5-digit	58285	$ .071	4138.24
	7. Basic	278	$ .085	23.63
	8. Rate Category		$	
	9. SUBTOTAL (1 through 8) ▶			4161.87
	10. Additional Postage Payment (State reasons for additional postage payments)		$	

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable) ▶ Total Postage $ 4161.87

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Shelley Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

SALT LAKE CITY, UT OCT 15 1986 USPS

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-494-[illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

HANSEN mailing

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 08

10/15/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7786 UTAH REPUBLICAN PARTY

~~FLAT SIZE-All mail (normally processed through flat cases~~

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
39	0	3	3RD	0.383400	41.71	58563	1404.05

PER PIECE CHARGE FOR 5 DIGIT PRESORT $4[illegible].24 58285 PIECES AT 0.07[illegible]

BASIC RATE RESIDUAL PIECES CHARGE $ [illegible] [illegible] PIECES AT 0.08[illegible]

TOTAL POSTAGE FOR MAILING $[illegible]

(Received for dispatch by)

(Signature of Weigher)

PS FORM 3607 FACSIMILE

YOUR ACCOUNT BALANCE IS -$[illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

0004078225

EXHIBIT 3

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4969

10/10 19 86

31-5
1240

PAY Three Hundred Fifty and 44/100---------- DOLLARS $350.44

TO THE ORDER OF
Hurst Jarrard and Company
428 South State St.
Salt Lake City, UT 84111

NOT NEGOTIABLE

⑈124000054⑈ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
	Jim Hansen News (BoxElder, Tremonton) 908			

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	SDI	STATE INCOME TAX		

0004078826

402

INVOICE

HURST
JARRARD
AND
COMPANY

428 South State St. / Salt Lake City, Utah 84111 / (801) 364-2930

Utah State Republican Party

Attn: Greg McDonough

Date: October 2, 1986

Please remit the following for expenses incurred in behalf of Jim Hansen for newspaper pre-print:

Box Elder News —	$234.76
Tremonton Leader —	115.68
TOTAL DUE HURST JARRARD & CO.:	$350.44

Thank you!!

Terms: Full payment of charges is due upon receipt of invoice unless otherwise indicated above.
A finance charge of 2% per month (24% annual) interest will be added to such accounts which are not paid within 30 days of receipt of invoice. Accounts which extend over 90 days will be processed for collection. In the event that this account becomes delinquent and it becomes necessary to make collection, the client hereby agrees to pay all collection costs, reasonable attorneys fees and court costs. No claim for adjustment may be made after 10 working days from receipt of this invoice.

0004078228

EXHIBIT 4

VOTER ID SURVEY SCRIPT

Hello,_____. This is _____calling. We are doing a survey of the 1986 election. It will only take two minutes of your time.

First of all are you registered to vote?
(Yes, No)

If the election for U.S. Senate were held today would you vote for (ROTATE)Jake Garn - Republican or Craig Oliver - Democrat?
(Jake Garn, Craig Oliver, Other, Don't Know)

If the election were held today for U. S Congress, would you vote for (ROTATE) Howard Nielson - Republican, or Dale Gardiner - Democrat?

Local Race (county commissioner)
If the election were held today, would you vote for (ROTATE)
_____ - Republican or _____ -Democrat?

In politics today, do you think of yourself as a Republican, a Democrat, an Independent voter, or what?
(Republican, Democrat, Independent, Other)

FOR DEMOCRATS, INDEPENDENTS, AND OTHERS
Let me check your name and mailing address

FOR REPUBLICANS ONLY
Would you like to do volunteer work for the Republican Party?

Do you need an absentee ballot?

Let me check your name and mailing address.

Finally, are there any other voters in your household

May I have their names so we can send them some information.

Is he/she registered to vote in your district?

THANK YOU SO MUCH FOR YOUR TIME

0 0 0 4 0 7 8 2 8 2 9

0004078230

EXHIBIT 5

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

8408ZFN10/15/86#122 $64,425.00 D 1135508#

99-8171 Always obtain an official receipt when making a deposit.

ZIONS FIRST NATIONAL BANK
100 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

304

DATE October 15 19 86

CURRENCY

COIN

CHECKS (LIST SEPARATELY)

1 64250 00
2 Net Wup. Sun Coast 60,000 00
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20

TOTAL FROM OTHER SIDE

TOTAL 64,425 00

TOTAL ITEMS

TOTAL DEPOSIT

RECEIVED BY

I. ITEMS ARE RECEIVED FOR THE PURPOSE OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑆124000054⑆ 01 13550 8⑈

00040762831

000407628 32

JAKE GARN RE-ELECTION COMMITTEE
1815 H STREET, NW., SUITE 1000
WASHINGTON, D.C. 20006

1338

Oct 13 19 86 31-7350 1240

PAY TO THE ORDER OF Utah State Republican Party $ 4425 cc

Four Thousand Four Hundred Twenty Five DOLLARS

CSB TOWER OFFICE
CSB Commercial Security Bank
50 S MAIN
SALT LAKE CITY, UTAH 84101

FOR

⑈001338⑈ ⑆124000737⑆ 5800124 17⑈

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CORPORATE ESCROW ACCOUNT
OFFICE FACILITIES
440 FIRST STREET, N.W., 6TH FLOOR
WASHINGTON, D.C. 20001

D.C. National Bank ★★★ DISTRICT OF COLUMBIA NATIONAL BANK

1443

October 8 19 86 18-120/540

PAY *Sixty thousand and 00/00* ********** DOLLARS $ *60,000.00*

TO THE ORDER OF
Utah REpublican State Central Committee
643 East 400 South
Salt Lake City, Utah 84102

⑈0000 1443⑈ ⑆054001204⑆ ⑈ 268567 ⑈

KPMG Peat Marwick

Certified Public Accountants

Peat Marwick Main & Co.
60 East South Temple, Suite 900
Salt Lake City, UT 84111

Telephone 801 328 3000

Telecopier 801 237 1552

October 25, 1988

Mr. Michael Jones
Utah Republican Party

We have applied the procedures described below with respect to the so-called "nonfederal account" (the Account) maintained by the Utah Republican Party (the Party) for the period from July 1, 1986 through December 31, 1986. These procedures, which were agreed to by the Utah Republican Party and Federal Election Commission, were performed solely to assist you in determining the extent of compliance with federal campaign financing laws and this report is not to be used for any other purpose, nor be referred to or distributed for any purpose to anyone who is not an official of the Utah Republican Party or the Federal Election Commission. The procedures we performed and the corresponding results are summarized as follows:

- We inquired of officials and appropriate employees of the Party and determined that the Account is maintained for the purpose of receiving and disbursing funds for election campaigns for Republican candidates for nonfederal office within the State of Utah, as well as, to provide funds for the ongoing operations of the Party, including salaries and wages for employees; rent, utilities, postage and other operating expenses; and other general expenses as may be incurred in the course of its operations.

- We read the federal campaign financing laws as provided to us by you. We have relied upon legal counsel of the Party to provide us with such additional information as may be relevant since legal interpretations are considered outside of our areas of competence and we cannot be considered to be expert in that area.

- We examined disbursements for other than payroll-related expenses which were recorded in the Account from July 1, 1986 through December 31, 1986, including examination of cancelled checks, supporting invoices and vouchers and any other supporting information which allowed us to determine whether such transactions were for federal or nonfederal campaign purposes.

[redacted] Peat Marwick

The results are summarized as follows:

A. General disbursements made from the Account for federal campaign purposes:

Check No.	Amount	Purpose
4613	$ 1,331.20	Radio - second congressional district
4614	1,330.00	Radio - second congressional district
4615	1,360.00	Radio - second congressional district
4963	5,232.90	Radio production - second congressional district
4998	9,823.11	Printing - Shimizu
4687	1,316.25	Radio production - second congressional district
4920	4,161.87	Mailing - Hansen
4957	3,242.00	Comparison piece - Hansen
4969	350.44	Newspaper - Hansen
5034	356.00	Mailing - Hansen
5038	3,611.18	Mailing - Hansen, Owens, Shimizu
Total	$ 32,114.95	

B. Cost of mass mailing for candidates for which documentation of reimbursement from such candidates was not available:

Total disbursements for mass mailings from July 1, 1986 to December 31, 1986	$ 54,384.65
Reimbursements received from candidates	33,890.22
Net nonreimbursed mass mailing costs	$ 20,494.43

C. Costs of phone banks assumed to be equally distributed between federal and nonfederal campaign purposes:

Total disbursements for phone banks from July 1, 1986 to December 31, 1986	$ 32,651.22
Less:	
Phone bank costs allocated to nonfederal purposes	(16,325.61)
Phone bank costs reimbursed by federal candidates and National Republican Senatorial Committee	(16,325.61)
Net nonreimbursed phone bank costs allocated to federal purposes	$ -

SUMMARY OF DISBURSEMENTS FOR FEDERAL PURPOSES

General expenses	$ 32,114.95
Mass mailings	20,494.43
Phone banks	-
Total	$ 52,609.38

° We inquired of appropriate Party officials as to their awareness of any other items such as those disclosed above which were improperly disbursed from the Account during the period from July 1, 1986 to December 31, 1986. They indicated they were aware of none.

[redacted] Peat Marwick

Mr. Michael Jones
Utah Republican Party
October 25, 1988
4

Because the above procedures do not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the amounts listed above or on the balance of the Account as of any date. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that there were additional disbursements made from the Account for federal purposes. Had we performed additional procedures, made an examination of the financial statements in accordance with generally accepted auditing standards, or performed a study and evaluation of the system of internal accounting controls, other matters might have come to our attention that would have been reported to you. This report relates only to the procedures specified above and does not extend to the financial statements of the Utah Republican Party taken as a whole.

Peat Marwick Main & Co.

0004078235

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	}	
	}	MUR 2288
Utah State Republican Party	}	

ANSWERS TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

The Utah State Republican Party (hereinafter referred to as the "Party" or the "State Party") hereby submits its answers to interrogatories and request for production of documents propounded by the Federal Election Commission.

INTERROGATORY NO. 1:

Your April 25, 1988 Response includes an invoice from Progressive Direct Mail for services rendered regarding "Tom Shimizu - Red 1 + 1 Letter." Provide a copy of this document.

a. State the name of the vendors used to print and process this document and provide copies of all documents evidencing payments, including postage.

b. State the source of funds used to pay for the costs noted above. Provide copies of all documents evidencing payments.

c. State whether this letter was considered to be volunteer activity and if so, state specifically what tasks the volunteers performed in relation to the sending of the letter.

ANSWER TO INTERROGATORY NO. 1:

A copy of the "Tom Shimizu - Red 1 + 1 Letter" is attached hereto as Exhibit A.

a. Communication Graphics printed the mailer. Progressive Direct Mail was used for labeling, sorting, and bulk mail handling. Documents evidencing payments to these entities are attached hereto as

Exhibit B. Postage for this and other mailers was paid out of the State Party postage account. General deposits were made into the postage account as evidenced by the checks attached as Exhibit C. However, there is no direct correlation between deposits into the general postage account and specific mailings. Separate mailing permit statements are attached as Exhibit D.

b. Communication Graphics was paid out of the federal account as evidenced by the first check attached at Exhibit B. Progressive Direct Mail and postage were paid out of the Non-Federal Account as evidenced by the second check attached at Exhibit B.

c. As with the other mailers involved in this investigation, the Utah State Republican Party contends that the Garn-Shimizu Red 1+1 Letter had a significant volunteer component, including primarily the activities described in the affidavits of Arlene Ellis and Gregory Hopkins previously submitted. Volunteers were used to pick up the mailers from the printer as they were printed. Volunteers then stamped each mailer with the bulk mail stamp, then boxed them ready for delivery to Progressive Direct Mail. Volunteers also transported the mailers to Progressive Direct Mail.

INTERROGATORY NO. 2:

Your April 25, 1988 Response states that certain federal expenditures were paid for by the Non-Federal Account. Attachments 2 and 3 to this April 25, 1988 Response contained checks and invoices pertaining to these disbursements. Your response stated $13,434.29 was paid from the Non-Federal Account for these expenditures; however, these checks and invoices total $20,282.42.

a. State the reason for this discrepancy.

b. Specify the amounts expended from the Non-Federal Account relating to this documentation and provide copies of all documents evidencing payments from the Non-Federal Account.

c. For each payment made from the Non-Federal Account noted in (b), list the balance of the Non-Federal Account on the date of the payment and identify the sources of funds received by the Non-Federal Account constituting the balance of the account on the payment date. For purposes of this matter, such funds constituting the balance are the funds received by the Non-Federal Account most recent to each specified payment date (Last In, First Out, or "LIFO"). The source of funds should be broken down by identifying the entity providing the monies, the amount, and the date received by the Non-Federal Account.

ANSWER TO INTERROGATORY NO. 2:

a. The check to Communication Graphics for $9,823.11 was used to pay the invoice for the same amount. The copy received by the Federal Election Commission with the April 25, 1988 response may have been difficult to read. Another copy is attached hereto at Exhibit E. The check for $3,611.18 was used to pay the invoices of $3,025.55, as well as another invoice for $585.63. These checks and corresponding invoices are attached hereto at Exhibit B. Thus, $13,435.29 was paid from the Non-Federal Account for

0040702837

these expenditures.

b. Both of the checks referred to in the answer to Interrogatory 2(a) came from the Non-Federal Account.

c. The Non-Federal Account balance on October 24, 1986, the date of the check to Communications Graphics, was $38,699.45. On October 31, 1986, the date of the check to Progressive Direct Mail, the balance was $7,012.83. The sources of funds received by the Non-Federal Account on the payment dates are evidenced by the attachments marked as Exhibit J. This includes a $64,425.00 deposit made on October 15, 1986 from the Jake Garn Re-election Committee, and the National Republican Senatorial Committee. These contributions were specifically intended for federal campaign activities, but were inadvertently deposited in the Non-Federal Account.

INTERROGATORY NO. 3:

Your April 17, 1987 Response states the Federal Account paid $5,337.45 and $5,232.90, respectively, for two radio ads. The invoices provided in your April 25 Response total $5,435.60 for the former ad. Explain this discrepancy and provide all documents evidencing payments for both ads.

ANSWER TO INTERROGATORY NO. 3:

The first radio ad invoice for Media Buy and Production totalled $5,337.45. Checks to First Tuesday, KALL Radio, KSFI Radio, and KSL Radio totalled that precise amount. Invoices and checks are attached hereto as Exhibit F. The April 25, 1987 Response inadvertently included an invoice of $1,414.40, which was actually

an invoice to First Tuesday rather than to the Republican Party. (Exhibit G). The invoice from First Tuesday to Utah Republican Headquarters at Exhibit F reflects the actual cost to the Party, and thus the figure given in the April 17, 1987 response of $5,337.45 is the accurate figure, rather than the $5,435.60 figure given in the April 25, 1988 response.

INTERROGATORY NO. 4:

Your April 17, 1987 Response regarding the "This Is The Door Mailer" noted the Federal Account paid $4,911.55 (printing), $772.11 (labeling) and $3,783.34 (postage) and that the mailing consisted of 77,211 pieces. The postage invoice included in your March 14 Response indicates this mailing was 66,331 pieces with $4,716.60 paid for postage. Your April 25 Response contains an invoice noting 75,600 pieces were printed, however, the direct mail firm's invoice noted 77,211 pieces of this mailer were processed.

a. State the number of mailers printed and the number mailed. Explain the discrepancies, if any, between the numbers.

b. State whether any copies were retained. If so, state how many.

c. State whether any pieces were circulated by means other than mail. If so, state how many.

d. State the amount paid for postage.

e. Provide copies of documents evidencing payments pertaining to this mailing.

ANSWER TO INTERROGATORY NO. 4:

a. The invoice from Communication Graphics indicates that 75,600 "This Is The Door" mailers were printed. The total cost reflected on the invoice is $9,823.11 for 75,600 "This Is The Door" mailers and 75,600 "The Company He Keeps" mailers, or, presumably, $4,911.55 for each set of mailers. Invoices from Progressive

Direct Mail and the postal service indicate that 77,211 "This Is The Door" mailers were mailed. (See Exhibit H. The postage invoice included in the March 14, 1988 response was an incorrect invoice.) It is likely that the Communication Graphics' invoice reflected an estimated number to be printed, when actually a few thousand more were printed. The figure that was actually mailed probably represents either the number actually printed or the number of addresses on the mailing list.

b. To the best of our knowledge, no copies of the mailers were retained.

c. The mailers were circulated only by mail.

d. The amount paid for postage was $5,489.08.

e. See Exhibit H.

INTERROGATORY NO. 5:

Your April 17, 1987 Response regarding the You Can Tell Mailer indicated that the Federal Account spent $7,957.15 (printing), $1,214.33 (labeling) and $5,827.72 (postage), and that the mailing consisted of 118,933 pieces. The text of the March 14, 1988 Response indicated $8,666.21 was spent on printing and included a postage invoice of $2,757.98 for mailing 38,834 pieces of mail, and an invoice for 48,000 mailers printed at a cost of $2,880 (excluding tax). Your April 25, 1988 Response states the printing costs figure in the text of the March 14, 1988 Response was in error and that this amount was actually $7,948.56.

a. State the number of mailers printed and the number mailed. Explain the discrepancies, if any, between the two numbers.

b. State whether any copies were retained. If so, state how many.

c. State whether any pieces were circulated by means other than mail. If so, state how many.

d. State the amount paid for postage.

e. Provide copies of all documents evidencing payments pertaining to this mailing.

ANSWER TO INTERROGATORY NO. 5:

a. 123,600 "The Company He Keeps" mailers were printed. The total number mailed is 118,933. (See Exhibit I.) The difference between the two numbers is likely the result of an overestimation of the number actually needed for the mailing or an overrun by the printer.

b. To the best of our knowledge, no copies of the mailers were retained.

c. The mailers were distributed only by mail.

d. The amount paid for postage was $8,444.37.

e. See Exhibit I.

INTERROGATORY NO. 6:

Your response in this matter noted the role played by volunteers relating to certain mailings during the 1986 election cycle.

a. State the number of mailings made using volunteer participation. Identify each mailing. If any of these mailers have not been provided to the Commission in your previous responses, state the costs of each mailing and identify the account from which they were paid.

b. Describe the procedures used in these mailings, including but not limited to, how printed materials were delivered to you from the printer, how the pieces were "bundled ready for labeling", (as stated in your May 26, 1987 Response) how the mailers were transported to Progressive Direct Mail, and how the mailers were transported to the post office. Specify whether any of these functions were performed by volunteers.

c. **Describe the services provided by Progressive Direct Mail for each of the mailers.**

d. **Other than stamping on the non-profit mail seal, state what other tasks the volunteers performed regarding these mailings.**

ANSWER TO INTERROGATORY NO. 6:

a. **Four mailers were produced and mailed for the Shimizu campaign in 1986 using volunteer participation. These mailers were as follows:**

Mailer	Cost[1]		Account
Garn-Shimizu Red 1+1 Letter	Printing:	$2,980.00	Federal
	Labeling:	205.26	Non-Federal
	Postage:	2,167.35	Non-Federal
Blue Garn-Shimizu Letter	Printing:	$2,343.00	Federal
	Labeling:	299.01	Non-Federal
	Postage:	2,122.97	Non-Federal
"This is The Door" Mailer	Printing	$4,655.50	Federal
	Labeling:	722.11	Non-Federal
	Postage:	5,489.09	Non-Federal
"The Company He Keeps" Mailer	Printing	$2,880.00	Federal
		4,655.50	Non-Federal
	Labeling:	1,214.33	Non-Federal
	Postage:	8,444.37	Non-Federal

b. In addition to the previous information provided concerning volunteer activity, including the affidavits of Arlene Ellis and Gregory Hopkins, volunteers were used to pick up the mailers, as they were printed, from the printers. After volunteers

[1]This cost breakdown does not include sales tax. The sales tax paid is listed on the separate invoices.

stamped each mailer, as previously described, mailers were manually bundled and boxed ready for delivery by the volunteers. The volunteers then transported the mailers by motor vehicle to Progressive Direct Mail. The mailers were taken to the Post Office by Progressive Direct Mail.

c. Progressive Direct Mail labelled and sorted for bulk mail handling all of the mailers. Progressive Direct Mail prepared the labels from mailing lists provided by the Utah State Republican Party.

d. See response to Interrogatory 6(b).

DATED this 27 day of October, 1988.

Gregory Hopkins

GREGORY HOPKINS
EXECUTIVE DIRECTOR
UTAH STATE REPUBLICAN PARTY

STATE OF UTAH }
: ss.
COUNTY OF SALT LAKE }

On the 27 day of October, 1988, personally appeared before me Gregory Hopkins, signer of the foregoing instrument, who duly acknowledged to me she executed the same.

Marilyn D. Farley

NOTARY PUBLIC
Residing at Ogden, Utah

My commission expires:

9-27-91

0004078246

EXHIBIT A

Jake Garn's Vote in the Senate
+ Tom Shimizu's Vote in the House
= 2 Strong Votes For Utah

Senator Jake Garn and Tom Shimizu will work together as a team to provide effective leadership for Utah.

IT JUST DOESN'T MAKE SENSE TO VOTE FOR SENATOR JAKE GARN AND THEN VOTE FOR SOMEONE WHO WILL WORK AGAINST HIM IN THE HOUSE OF REPRESENTATIVES. JAKE GARN NEEDS TOM SHIMIZU IN CONGRESS.

TWO VOTES FOR UTAH ARE CERTAINLY BETTER THAN NONE.

00407628247

0 0 0 4 0 7 6 2 8 4 8

NON-PROFIT ORG.

UTAH STATE REPUBLICAN PARTY
643 East 400 South
Salt Lake City, Utah 84102

Why Are These Formulas So Important?

1 + 1 = 2

1 - 1 = 0

SENATOR
JAKE GARN

+

TOM SHIMIZU

=

TWO
STRONG
VOTES FOR
UTAH

A VOTE FOR TOM SHIMIZU

Is A Vote For Jake Garn, Too.

On November 4th, Vote Garn & Shimizu

Paid for by the Utah State Republican P

0004078249

EXHIBIT B

INVOICE

INVOICE

1226

P.O. Number _____

...utter Street • Murray, Utah 84107 • (801) 266-5757

Shimizu For Congress
Utah State Republicah Party
643 East 400 South 84102

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct 27, 1986

CUSTOMER PURCHASE ORDER NO: _____

TERMS: _____

Description	Amount
48,000 You Can Tell alot about A Man by the Company He Keeps(11" x 17" Brochures).....	...$2880,00
36,500 Garn Letters(Blue& Black)	...$2190.00
(Pre P.S. Statement: Plate Change after running 14,000 on 1 side: Cost of Paper/Time & Plate Change).....	...$153.00
Garn/Shimizu Letter(Red/Black) 48,000	..$2880.00
Typesetting/Pasteup/PMT/Design of Garn Brochures	...92.00

TERMS: NET 30 DAYS. A **FINANCE CHARGE** of 1½% per month (**18% ANNUAL RATE**) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

Sub Total	$8195.00
Tax	471.21
Total	$8666.21

RECEIVED BY _____

CUSTOMER SIGNATURE

INVOICE

No 1383

UTAH REPUBLICAN PARTY
FEDERAL CAMPAIGN FUND
150 SOUTH 600 EAST #2B 533-9777
SALT LAKE CITY, UTAH 84102

979

[illegible] NATIONAL BANK
[illegible] Salt Lake City, Utah 84101
31-5/1240

PAY Eight Thousand Six Hundred Sixty Six and 21/100 Dollars-------

DATE 11/3/86 | AMOUNT $ 8,666.21

Communication Graphics
6209 Strieber Street
Murray Utah 84107

ORDER S
OF

NOT NEGOTIABLE

⑈0001333⑈ ⑆124000054⑆ 01 13953 4⑈

VPR Rocky Mountain Bank Note

PAYEE DETACH THIS STATEMENT BEFORE DEPOSITING

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND

DATE	ACCOUNT OR INVOICE NO	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		PRINTING			

EMPLOYEE'S NAME

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND
SALT LAKE CITY, UTAH

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	FICA	FED WITH TAX	STATE WITH TAX				NET EARNINGS PAID
	REG T O T									

EMPLOYEE. THIS IS A STATEMENT OF YOUR EARNINGS AND DEDUCTIONS FOR PERIOD INDICATED. KEEP THIS FOR YOUR PERMANENT RECORD

Progressive Direct Mail Advertising
2089 West 2300 South * Salt Lake City, Utah 84119
Phone (801) 972-8888

INVOICE

SOLD TO:

Utah Republican Party
643 East 400 South #A
Salt Lake City, Utah 84102

INVOICE NO: 35157
INVOICE DATE: 30 October 1986
YOUR P.O. NO.
TERMS Net

Please Pay This Amount

QUANTITY	DESCRIPTION	AMOUNT
	Jim Hansen "Is There Really A Difference"	
43484	Labeling, sorting and bulk mail handling	434.84
	Wayne Owens Door-Tom Shimizu	
77211	Labeling, sorting and bulk mail handling	772.11
	Tom Shimizu-The Company He Keeps	
118933	Labeling, sorting and bulk mail handling-with set up	1214.33
	Tom Shimizu-Blue Jake Garn Letter	
29901	Labeling, sorting and bulk mail handling	299.01
	Tom Shimizu-Red 1 + 1 Letter	
30526	Labeling, sorting and bulk mail handling	305.26

Paid
10-31-86
$3025.55
5038

POSTAGE RESERVE	
POSTAGE USED	
POSTAGE DUE * OR CREDIT	

RESALE NO.

SALES TAX Exempt

* POSTAGE DUE OR CREDIT

TOTAL INVOICE 3025.55

Payment is due upon completion of work. Purchaser agrees to pay interest and service charges at the rate of 1 1/2% PER MONTH, WHICH IS AN EFFECTIVE RATE OF 18% PER ANNUM, on all accounts over 30 days from date of invoice. In the event of default of payment of items shown above, the purchaser agrees to pay collection fees including reasonable attorney fees.

0 0 2 4 0 7 8 2 8 5 2

UTAH REPUBLI[illegible] PARTY
643 EAST 400 SOUTH S[illegible] 801-533-9777
04/73 SALT LAKE CITY [illegible] 84102

[illegible] TIONAL BANK
First [illegible]
100 S[illegible]
Salt Lake City[illegible] 4101

5038

Oct 31 19 36

31-5
1240

PAY Three Thousand Six Hundred Eleven and 10/100 Dollars---------- DOLLARS $ 3,611.1[illegible]

Progressive DirectoMail

TO THE ORDER OF

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U.S. INC. TAX	SDI	STATE INCOME TAX			

0 0 0 4 0 7 8 2 8 1 5 3

Progressive Direct Mail Advertising
2089 West 2300 South ★ Salt Lake City, Utah 84119
Phone (801) 972-8288

INVOICE

SOLD TO:

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

INVOICE NO: 35121
INVOICE DATE: 22 October 1986
YOUR P.O. NO.
TERMS Net Payable Upon receipt

Please Pay This Amount

Customer Supplied Product

QUANTITY	DESCRIPTION	AMOUNT
	Jim Hansen 9 x 12 Brochure Mailed 10-15-86	
58563	Labeling, sorting and bulk mail handling	585.63

Paid
10-31-86
$585.63
#5038

POSTAGE RESERVE	
POSTAGE USED	
POSTAGE DUE * OR CREDIT	

RESALE NO.

SALES TAX Service

* POSTAGE DUE OR CREDIT

TOTAL INVOICE 585.63

Payment is due upon completion of work. Purchaser agrees to pay interest and service charges at the rate of 1 1/2% PER MONTH, WHICH IS AN EFFECTIVE RATE OF 18% PER ANNUM, on all accounts over 30 days from date of invoice. In the event of default of payment of items shown above, the purchaser agrees to pay collection fees including reasonable attorney fees.

0004076285

EXHIBIT C

0004070 2850

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4911

10/10 19 86

31-6
1240

PAY One Thousand and Four Hundred and 00/100 DOLLARS $ 1400.00

TO THE ORDER OF U.S. Postmaster

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Permit #150 Bulk Mail			

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC. TAX	S.D.I	STATE INCOME TAX			

9 0 9 4 0 7 0 2 8 5 7

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4928

10/22 19 86

31-5
1240

PAY Four Thousand Seven Hundred Sixteen and 60/100---------- DOLLARS $ 4,716.60

TO THE ORDER OF U.S. Postmaster

Michael Lyon

NOT NEGOTIABLE

:: 1240000 54:: 01 13550 8

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Door Mailer			

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC. TAX	S.D.I.	STATE INCOME TAX			

0 0 7 4 0 7 6 2 8 5 8

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4929

10/22 19 86

315
1246

PAY Two Thousand and 00/100---------- DOLLARS $ 2,000.00**

TO THE ORDER OF U.S. Postmaster

Michael L Jones

NOT NEGOTIABLE

Dyy 14 Mar 87

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	General Bulk Mail Permitt #1863			

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC TAX	SDI	STATE INCOME TAX			

0 0 0 4 0 7 0 2 8 5 7

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

5000

Oct 23/86 19 86

31-5
1240

PAY Two Thousand and No/100 Dollars----------DOLLARS $ 2,000.00

U. S. Postmastee

TO THE ORDER OF

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Bulk Mail			

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U.S. INC TAX	S.D.I.	STATE INCOME TAX			

2 0 0 4 0 7 6 4 8 5 0

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
100 South Main
Salt Lake City, Utah 84101

5001

Oct. 24 19 86

31-5
1240

PAY Twenty Thousand and 00/100 DOLLARS $ 20,000.00

U. S. Postmaster

TO THE ORDER OF

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Bulk Mail			

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	SDI	STATE INCOME TAX			

0 0 0 4 0 7 0 4 3 5 1

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

Oct. 27 19 86

PAY Two Thousand Two Hundred Seventy nine dollars 68/100 DOLLARS $ 2279.68

PAY TO THE ORDER OF Bulk Mail

Judith W Carter

NOT NEGOTIABLE

Alyce M. Taylor

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

604

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
10/27	Direct Contribution Mailings			2279.68

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U S INC TAX	SDI	STATE INCOME TAX			

9 9 0 4 0 7 0 2 8 5 2

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

5010

Oct 28 19 86

31-5
1240

PAY Nine Thousand dollars and 00/100 — DOLLARS $ 9,000.00

TO THE ORDER OF Us S. Postmaster

Cindy Hitt

NOT NEGOTIABLE

Suzy H. McCarty

⑈124000054⑈ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Bulk Mail			9,000.00

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC. TAX	S.D.I.	STATE INCOME TAX			

⑈0040⑆78⑈8⑇5⑈

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

5031

Oct. 30 19 86

31-5
1240

PAY Five Hundred and 00/100 DOLLARS $ 500.00

U. S. Postmaster

TO THE ORDER OF

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	609 Bulk Mail Permit #			

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHHOLDING U. S. INC. TAX	S.D.I	STATE INCOME TAX			

⑈004078284⑈

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

5037

31-6
1240

OCT. 31 19 86

PAY Two Hundred Sixty Seven and 67/100 DOLLARS $ 267.67

TO THE ORDER OF U. S. Postmaster

NOT NEGOTIABLE

⑆124000054⑆ 01 83550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
	Bulk Mail 404			

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC. TAX	S.D.I	STATE INCOME TAX			

0004078 2865

UTAH REPUBLICAN PARTY

FEDERAL CAMPAIGN FUND
150 SOUTH 600 EAST #28 533-9777
SALT LAKE CITY, UTAH 84102

No 1375

979

ZIONS
FIRST NATIONAL BANK
[illegible]
Salt Lake City, Utah 84101
31-5/1240

PAY Two Hundred and 00/100---------- DATE AMOUNT $ 200.00**

[redacted]
ORDER
OF U.S. Postmaster

NOT NEGOTIABLE

⑈0001375⑈ ⑆124000054⑆ 01 13953 ⑈

VFR Rocky Mountain Bank Note

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
[redacted]		Bulk Mail Permit #1865			

EMPLOYEE'S NAME

UTAH REPUBLICAN PARTY - FEDERAL CAMPAIGN FUND
SALT LAKE CITY, UTAH

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	F.I.C.A	FED. WITH TAX	STATE WITH TAX				NET EARNINGS PAID
	REG. T. O.T.									

EMPLOYEE: THIS IS A STATEMENT OF YOUR EARNINGS AND DEDUCTIONS FOR PERIOD INDICATED. KEEP THIS FOR YOUR PERMANENT RECORD.

0004076265

EXHIBIT D

PS Form 3602, Apr. 1985 10-000 FOR ZONE RATED MAIL USE FORM 3605 Shimizu-Red 1 + 1 Letter

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAILER: Complete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing: Salt Lake City, Utah 84119

Date: 10-29-86

Receipt No:

Mailing Statement Sequence No:

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

both

Processing Category (See DMM 128)
- ☒ Letters
- ☐ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: 0137 lbs

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
30526	418	54			1

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☒ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate		No. Pounds	Rate/Pound	Postage
	1. Pound Rate Postage Charge		$	
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 30526	Rate Per Piece $ .071	Postage 2167.35
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 2167.35
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate Per Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable — Total Postage $ 2167.35

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate postal laws or DMM and (2) Only the mailer's matter is being mailed; (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false fictitious or fraudulent statements or representations is punishable by fine up to $10,000 or imprisonment up to 5 years or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency assessed) Shelley Holden

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate(s) claimed, paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time
A.M.
P.M.

PS Form 3602 Apr. 1985 ORIGINAL COPY FOR FILE FORWARD TO FINANCE

Shimizu 1+1 letter

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO.

10/29/86

SLC, UT 84199-9519 PERMIT NO. 1063

IANCE # 49-7786 UTAH REPUBLICAN PARTY

(ETTER SIZE-All mail normally processed through letter cases

SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
34	0	1	3RD	0.223500	71.50	3056	42[illegible]

PER PIECE CHARGE FOR 5 DIGIT AMOUNT $2167.35 3056 PIECES AT 0.[illegible]

Robert Tse

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS
(MAY NOT INCLUDE LATEST DEPO

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2303

PS Form 3602, Apr. 1985 10-984 FOR ZONE RATED MAIL USE FORM 3605 Chiazu- BlueLake Garn Letter

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MA[illegible]mplete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-28-86		

Check applicable box

1st Class
- ☐ International
- ☒ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify) piece

Processing Category (See DMM 128)
- ☒ Letters
- ☐ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece 0141 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
29901	422	65			1

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☒ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 29901	Rate Per Piece $ .071	Postage 2122.97
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 2122.97
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10 where applicable) Total Postage $ 2122.97

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of, or produced for, another person or organization that is not entitled to special bulk mailing privileges.

Willful and false statements or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both. (18 USC 1001)

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)
Shelly Nilsen

Telephone No. 972-9888

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr 1985 FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

Shimizu - Jake Garn Letter

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 193

10/28/86

SLC, UT 84199-9519 PERMIT NO. 1363

FINANCE # 49-7786 UTAH REPUBLICAN PARTY
(P.D.M.A.)

~~LETTER SIZE All mail normally processed through letter cases~~

NUMBER OF SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
65			3RD	0.227700	70.27	29901	425.53

PER PIECE CHARGE FOR 5 DIGIT PRESORT $2122.97 29901 PIECES AT .07¢

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS $44
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2003

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 113

10/22/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7736 UTAH REPUBLICAN PARTY
(U.R.P.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	NUMBER OF PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
8			3RD	0.451500	35.44	10380	307.02

PER PIECE CHARGE FOR 5 DIGIT PRESORT +772.43 10380 PIECES AT 0.07

(Received for dispatch BY) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
443 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2303

PS Form 3602, Apr. 1985 10-949 FOR ZONE RATED MAIL USE FORM 3605 "Is There Really A Difference"

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL[illegible]mplete all items by typewriter, pen or indelible [illegible]
Prepa[illegible]dicate if receipt is desired. Check for instructions fro[illegible]
your postmaster regarding box labeled "RCA Offices."

Permit No.

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		1863

Class of Mail or Kind of Matter
1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

3rd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0250 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
43484	1087	59			9

Name and Address of Permit Holder (Include ZIP Code)

Jim Hansen
Utah State Republican Party
[illegible] East 400 South
[illegible]t Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

			No. Pounds	Rate/Pound	Postage
Pound Rate	1.	Pound Rate Postage Charge		$	
Piece Rates	2.	ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3.	Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4.	ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5.	Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6.	5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7.	Basic	No. Qual. Pieces 43015	Rate Per Piece .071 $	Postage 3054.07
	8.	Rate Category	No. of Pieces 469	Rate Per Piece .085 $	Postage 39.87
	9.			SUBTOTAL (1 through 8) ✓	Postage

10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage 3093.94

11. ☐ Check if applicable third-class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable) ✓ Total Postage $ 3093.94

OCT 24 1986 U.S. POSTAL SERVICE

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time
A.M.
P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-[illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. [illegible]

10/24/86

SLC, UT 84199-9519 PERMIT NO. 1843

FINANCE # 49-7706 UTAH REPUBLICAN PARTY
(P.O.M.A.)

FLAT SIZE-All mail normally processed through flat cases

SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
59	0	3	3RD	0.365000	41.49	43484	1047.7

PER PIECE CHARGE FOR 5 DIGIT PRESORT	$3054.07	43015 PIECES AT 0.0
BASIC RATE RESIDUAL PIECES CHARGE	$39.87	469 PIECES AT 0.0
TOTAL POSTAGE FOR MAILING	$3093.94	

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS (
(MAY NOT INCLUDE LATEST DEPO

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2603

PS Form 3602, Apr. 1985 10-929 FOR ZONE RATED MAIL USE FORM 3605 Shimizu - The Company #20 Keeps 4

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL [illegible]lete all items by typewriter, pen or indelible p[illegible]. Prepare in dup[illegible]cate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-23-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class / 3rd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate
- ☐ Carrier Route
- ☒ xx digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

both

Processing Category (See DMM 128)
- ☐ Letters
- ☒ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0286 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
55239	1580	46			3

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☒ Check if non-profit under 623, DMM*

Name and Address of Post Office for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623, DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 55239	Rate Per Piece $ .071	Postage 3921.97
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 3921.97
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. **TOTAL POSTAGE** (9 plus 10) where applicable) — Total Postage $ 3921.97

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred) Shelley Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-477-047/25921 FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

SHIMIZU
"THE COMPANY HE KEEPS"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 57

10/23/84

SLC, UT 84199-9519 · PERMIT NO. 1663

NANCE # 49-7786 UTAH REPUBLICAN PARTY (P.D.M.A.)

FLAT SIZE-ALL mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	NUMBER OF PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
45	0	3	3RD	0.452700	35.34	55239	1562.72

PER PIECE CHARGE FOR 5 DIGIT PRESORT $3721.37 55239 PIECES AT 0.07¢

(Received for dispatch by) (Signature of Weisher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS $17,[illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH, #A
SALT LAKE CITY, UT 84102-2603

PS Form 3602, Apr. 1985 — FOR ZONE RATED MAIL USE FORM 3605

10-020B

Shimkus "The Company He Keeps"

U.S. Postal Service

STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAI[illegible]plete all items by typewriter, pen or indelible
Prep[illegible]icate if receipt is desired. Check for instructions from
your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☒ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece both

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: 0284 lbs

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
38843	1103	33			2

Name and Address of Permit Holder (Include ZIP Code)

Utah State Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7. Basic	No. Qual. Pieces 38834	Rate Per Piece $ .071	Postage 2757.21
	8. Rate Category	No. of Pieces 9	Rate Per Piece $ .085	Postage .77
	9. SUBTOTAL (1 through 8)			Postage

10. Additional Postage Payment (State reasons for additional postage payments) — No. Pieces — Rate/Piece $ — Postage 2757.98

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10 where applicable) — Total Postage $ 2757.98

*The signature of a nonprofit applicant certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed; and (3) This is not a [illegible] for other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken [illegible] on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Signature of Weigher

Time
A.M.
P.M.

Postal Service Use Only

PS Form 3602, Apr. 1985 — FINANCIAL DOCUMENT — FORWARD TO FINANCE OFFICE

Shimizu
"THE Company
HE KEEPS"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 180

10/24/86

P.O. UT 84199-9519 PERMIT NO. 1663

FINANCE # 49-7786 UTAH REPUBLICAN PARTY
(P.R.P.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
33	0	2	SRD	0.452000	35.34	38843	1099.2

PER PIECE CHARGE FOR 5 DIGIT PRESORT [illegible] 38834 PIECES AT 0.00[illegible]

BASIC RATE RESIDUAL PIECES CHARGE $0.77 9 PIECES AT 0.[illegible]

TOTAL POSTAGE FOR MAILING $[illegible]

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS [illegible]
MAY NOT INCLUDE LATEST DEPOS[illegible]

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2003

PS Form 3602 Apr. 1985 10-929C FOR ZONE RATED MAIL USE FORM 3605 SHIMIZU THE COMPANY

Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

Complete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. HE KEEPS 11
1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: 0292 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
12690	371	9			1

Name and Address of Permit Holder (Include ZIP Code)
Tom Shimizu
Utah State Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☒ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

		No. Pounds / No. Qual. Pieces	Rate/Pound / Rate Per Piece	Postage
Pound Rate	1. Pound Rate Postage Charge		$	
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7. Basic	No. Qual. Pieces 12690	Rate Per Piece $ .071	Postage 900.99
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage 900.99

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable) → Total Postage $ 900.99

SALT LAKE CITY UTAH OCT 24 1986 USPS

*The signature of the mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed; (3) This is not a subterfuge to mail with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)
Lynette Nelson

Telephone No. 972-8283

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp

Signature of Weigher

Time
A.M.
P.M.

PS Form 3602, Apr. 1985 (U.S. G.P.O. 1985-[illegible]) FINANCIAL DOCUMENT – FORWARD TO FINANCE [illegible]

SHMIZU "The Company He Keeps"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 178

10/24/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7786 UTAH REPUBLICAN PARTY (P.R.P.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
9			3RD	0.447300	35.77	12690	354.76

PER PIECE CHARGE FOR 5 DIGIT PRESORT $900.99 12690 PIECES AT 0.07

(Received for dispatch by) (Signature of Weisner)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS: $ 7021 **
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

PS Form 3602, Apr. 1985 10-9290 FOR ZONE RATED MAIL USE FORM 3605 Shimizu

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MA[illegible]mplete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. THE Company HE 1863 KEEPS

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-27-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify) piece

Processing Category *(See DMM 128)*
- ☐ Letters
- ☐ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0280 ___ ___ lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
12161	341	11			1

Name and Address of Permit Holder *(Include ZIP Code)*
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared *(If other than permit holder)*

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent *(If other than permit holder)*
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

		No. Pounds / No. Qual. Pieces	Rate/Pound / Rate Per Piece	Postage
Pound Rate	1. Pound Rate Postage Charge		$	
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	$	
	3. Presort First Class	No. Qual. Pieces	$	
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	$	
	5. Carrier Route	No. Qual. Pieces	$	
	6. 5-digit	No. Qual. Pieces 12161	$ .071	863.43
	7. Basic	No. Qual. Pieces	$	
	8. Rate Category	No. of Pieces	$	
	9. SUBTOTAL (1 through 8)			863.43

10. Additional Postage Payment *(State reasons for additional postage payments)* — No. Pieces — Rate/Piece $ — Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. *(Form 3602-PC required)*

12. TOTAL POSTAGE *(9 plus 10)* where applicable) → Total Postage $ 863.43

SALT LAKE CITY UTAH OCT 27 1986

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent *(Both principal and agent are liable for any postage deficiency incurred)*
Shelley Nelsen

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required) SALT LAKE CITY UTAH OCT 28 1986

Signature of Weigher

Time A.M. P.M.

PS Form 3602 Apr. 1985 U.S. [illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

THE Company HE Keeps

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 137

10/28/86

SLC, UT 84199-9519 PERMIT NO. 1862

FINANCE # 49-7786 UTAH REPUBLICAN PARTY

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	NUMBER OF PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
11			3RD	0.446300	85.81	12161	141.70

PER PIECE CHARGE FOR 5 DIGIT PRESORT $863.43 12161 PIECES AT 0.07¢

(Received for dispatch by)

Suellen Hurst
(Signature of Weigher)

PS FORM 3607 FACSIMILE

YOUR ACCOUNT BALANCE IS [illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

PS Form 3602, Apr. 1985 10-866 FOR ZONE RATED MAIL USE FORM 3605 Deliver to: Jim Hansen 9 x 12 Broch.

U.S. Postal Service

STATEMENT OF MAILING WITH PERMIT IMPRINTS

MA[illegible] complete all items by typewriter, pen or indelib[illegible]
Pre[illegible]licate if receipt is desired. Check for instructio[illegible]
your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-15-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☑ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

both

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0285 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
58563	1435	39			3

Name and Address of Permit Holder (Include ZIP Code)

Telephone No. 972-8288

Utah state Republican Party
643 East 400 South
Salt Lake City, Utah 84102

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 58265	Rate Per Piece $ .071	Postage 4138.24
	7. Basic	No. Qual. Pieces 278	Rate Per Piece $ .085	Postage 23.63
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8) ▶			Postage 4161.87
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable ▶ Total Postage $ 4161.87

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Shelley Nelson

Telephone No 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

SALT LAKE CITY, UT OCT 15 1986 USPS

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 [illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

HANSEN mailing

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 08

10/15/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7786 UTAH REPUBLICAN PARTY

FLAT SIZE-All mail (or mail) processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
39	0	3	3RD	0.388600	41.71	58563	1404.05

PER PIECE CHARGE FOR 5 DIGIT PRESORT $4135.24 58295 PIECES AT 0.071

BASIC RATE RESIDUAL PIECES CHARGE + $23.63 [illegible] PIECES AT 0.[illegible]

TOTAL POSTAGE FOR MAILING $4161.07

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS -$[illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

0004078284

EXHIBIT E

Communication Graphics

6209 Stratler Street • Murray, Utah 84107 • (801) 266-5757

INVOICE

P.O. Number 1213

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct. 11, 1986

CUSTOMER PURCHASE ORDER NO:

TERMS: C.O.D.

Description	Amount
Tom Shimizu for Comgress	
75,600 2-Color Brochures (22" x 8½") #70 Stock	
75,600 2-Color Brochures (11" x 17") #70 Stock	
Printing/Folding @ 6¢ ea	$9072.00
Typesetting/Art/Design & Pasteup	217.00

TERMS: NET 30 DAYS. A **FINANCE CHARGE** of **1½%** per month (**18% ANNUAL RATE**) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

RECEIVED BY _____
CUSTOMER SIGNATURE

Sub Total	$9289.00
Tax	$534.11
Total	$9823.11

0004078185

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4998

Oct. 24 19 86

31-5
1240

PAY Nine Thousand Eight Hundred Twenty Three and 11/100 Dollars------ DOLLARS $ 9,823.11

TO THE ORDER OF
Communication Graphics
6209 Statler Street
Murray, UT 84107

NOT NEGOTIABLE

⑈004998⑈ ⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO	AMOUNT

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC TAX	S.D.I	STATE INCOME TAX			

w

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

90119-1-9

4998

$ L S

T# 6

NOT NEGOTIABLE

GRANITE DISTRICT CREDIT UNION

Oct. 24 19 86

31-5
1240

PAY Nine Thousand Eight Hundred Twenty Three and 11/100 Dollars------ DOLLARS $ 9,823.11

TO THE ORDER OF
Communication Graphics
6209 Statler Street
Murray, UT 84107

⑈004998⑈ ⑆124000054⑆ 01 13550 8⑈

⑈000982311⑈

CLARKE CHECKS

0004078397

EXHIBIT F

First Tuesday
Advertising & Public Relations

Invoice # 029

Date: 8/6/86

To: Utah Republican Headquarters
643 E. 400 S.
Salt Lake City, Ut. 84102
Attn: Greg McDonough

Client	Job Description		Amount
110-10	Radio Production/ Owens Ad		
	Copywriting/ Producer		$215.85
	Production/Re-production		$884.40
	Talent		$216.00
			$1,316.25
110-11	Media Buy		
	Kall Radio		$1331.20
	KSFI- Radio	PRE-PAID	$1330.00
	KSL Radio		$1360.00
			$4,021.20
	TOTAL DUE		$1,316.25

1358 SOUTH MAIN • SALT LAKE CITY, UTAH 84115 • 801-484-0165

4687

UTAH REPUBLICAN PARTY
842 EAST 400 SOUTH SUITE A 801-533-9777
SALT LAKE CITY, UTAH 84102

473

ZIONS FIRST NATIONAL BANK
102 South Main Street
Salt Lake City, Utah 84101

31-6/1240

PAY One Thousand Three Hundred Sixteen and 25/100 Dollars--------

DATE 8/7/86

AMOUNT $ 1,316.25

ORDER OF

First Tuesday Advertising & Public Relations

Judith W. Parker

NON-NEGOTIABLE

⑈004037⑈ ⑆124000054⑆ 01 13550 8⑈

DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
		Media Buy			

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	GROSS							NET EARNINGS PAID
	REG. T. O.T.									

TOTAL DUE $1,316.25

⑈004037⑈ ⑆124000054⑆ 01 13550 8⑈

[redacted]
SALT LAKE CITY, UTAH 84102

[redacted] FIRST NATIONAL BANK
[redacted]

[redacted]

PAY One Thousand Three Hundred Thirty One and 20/100 /Dollars

DATE 7/10/86

AMOUNT $ 1,331.20

TO THE ORDER OF KALL Radio

Judith W. Parker

NON-NEGOTIABLE

[redacted] :124000054: 01 13550 [redacted]

* N O T E : DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS $	[redacted]	FEDERAL [redacted]	STATE [redacted]	[redacted]	[redacted]	[redacted]	NET EARNINGS PAID
	REG. T. O.T.									

EMPLOYEE: This is a [redacted] Form. [redacted] FOR YOUR RECORDS.

[redacted]

[redacted]

UTAH REPUBLICAN PARTY
[redacted] SALT LAKE [redacted]

[redacted]

ZIONS FIRST NATIONAL BANK
[redacted]
[redacted]

31-6/1240
1442[redacted]

PAY One Thousand Three Hundred Sixty and No/100 Dollars

DATE 7/10/86

AMOUNT $ 1,360.00

TO THE ORDER OF KSL Radio

Judith W. Payne

NON-NEGOTIABLE

⑈0046⑆5⑈ ⑆124000054⑆ 01 ⑆3550 8⑈

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S RECORD

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	F.I.C.A.	FED. W/H TAX	STATE W/H TAX				NET EARNINGS PAID
	REG. T. O.T.									

EMPLOYEE: THIS IS A STATEMENT OF [redacted] FOR YOUR PERSONAL RECORDS

0004⑆5⑈ ⑆124000054⑆ 01 ⑆3550 8⑈

[redacted]

4614

UTAH REPUBLICAN PARTY
[illegible] EAST 400 SOUTH, SUITE A 801-[illegible]
SALT LAKE [illegible] UTAH 84102

[illegible] FIRST NATIONAL BANK
[illegible]
Salt Lake City, Utah 84101

91-6/1240
1[illegible]

PAY One Thousand Three Hundred Thirty and No/100 Dollars

DATE 7/18/86

AMOUNT $ 1,330.00

TO THE ORDER OF KSFI Radio

Judith W. Parker

~~NONNEGOTIABLE~~

⑈0246147⑈ ⑆124000054⑆ 01 13550 3⑈

PAYEE: DETACH THIS STATEMENT BEFORE DEPOSITING CHECK

UTAH REPUBLICAN PARTY

DATE	ACCOUNT OR INVOICE NO.	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT

EMPLOYEE'S NAME

PAY PERIOD ENDING	HOURS	RATE	GROSS EARNINGS	[illegible]	[illegible]	[illegible]				NET EARNINGS PAID
	REG. T. O.T.									

Employee Hours & Earnings [illegible] Financial Assistance Program [illegible] Internal Revenue Service

0 0 0 4 0 7 8 2 8 2

First Tuesday
Advertising & Public[redacted]

Invoice # 06[redacted] (068)

Date: 10/6/86

To: Utah Republican Party
643 East 400 South
Salt Lake City, UT 84102

Client	Job Description	Amount
110-03	Radio Media Buy	
	KALL	$ 732.00
	KSL	1,980.00
	KSFI	1,440.00
	KKAT	810.00
		4,962.00
110-04	Radio Production	
	Studio/Dubs	102.90
	Talent	108.00
	Producer	60.00
		270.90
	TOTAL DUE	$5,232.90

c 0 0 4 0 7 8 2 8 9 3

[redacted] 643 EAST 400 SOUTH SUITE A 801-533-9777
04/73 SALT LAKE CITY, UTAH 84102

[redacted] 84101

4963

Oct. [redacted] 19 86

31-5
1240

PAY Five Thousand Two Hundred Thirty Two and 90/100 Dollars--------DOLLARS $ 5,232.30

TO THE ORDER OF
First Tuesday
1358 South Main
SLC, UT 84115

NOT NEGOTIABLE

⑆124000054⑆ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO.	AMOUNT
	Radio Buy 910			

E _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHOLDING U. S. INC. TAX	S.D.I.	STATE INCOME TAX			

⑈0004078298⑈

0004078283

EXHIBIT G

KALL-AM INVOICE

INVOICE DATE 07/28/86 PAGE 1

PLEASE REMIT TO: SALT LAKE CITY BROADCASTING CO
312 EAST SOUTH TEMPLE
SALT LAKE CITY, UTAH 84111

INVOICE NUMBER: 9742- 2

ORDER DATES: 07/11/86 - 07/17/86

BILLING DATES: 06/23/86 - 07/27/86

DESCR: UTAH REPUBLICAN PARTY

TO: 1ST TUESDAY ADVERTISING & P R (350)
1358 S MAIN STREET

SALT LAKE CITY, UT 84115

ADVT: UTAH REPUBLICAN PARTY (1771)

TERMS: DUE UPON RECEIPT ACCT EXEC: RICHARDSON, LARRY G.

RUN DATE	TIME	DESCRIPTION	REF	LENGTH	QTY	RATE	AMOUNT
07/11/86	7:08A						
07/11/86	9:08A		1	0:30	2	52.00	104.00
07/11/86	11:13A						
07/11/86	1:39P		2	0:30	2	52.00	104.00
07/11/86	3:54P						
07/11/86	5:52P		3	0:30	2	52.00	104.00
07/11/86	9:09P		4	0:30	1	52.00	52.00
07/14/86	6:39A						
07/14/86	8:53A						
07/15/86	8:13A						
07/16/86	8:25A						
07/17/86	6:26A		5	0:30	5	52.00	260.00
07/14/86	11:13A						
07/14/86	1:39P						
07/15/86	10:51A						
07/15/86	1:54P						
07/16/86	10:25A						
07/17/86	10:13A						
07/17/86	12:39P		6	0:30	7	52.00	364.00
07/14/86	3:31P						
07/14/86	5:03P						
07/15/86	3:54P						
07/15/86	5:41P						
07/16/86	2:42P						
07/16/86	6:09P						
07/17/86	3:10P						
07/17/86	5:07P		7	0:30	8	52.00	416.00
07/14/86	9:20P						
07/15/86	8:20P						
07/16/86	8:48P						
07/16/86	11:08P						
07/17/86	7:48P		8	0:30	5	52.00	260.00
					32		1664.00

COPY

WE WARRANT THAT THE ABOVE ANNOUNCEMENTS WERE BROADCAST IN ACCORDANCE WITH OFFICIAL STATION LOGS AS SHOWN ABOVE.

AGENCY COMMISSION: -249.60

TOTAL AMOUNT DUE: 1414.40

0004078227

EXHIBIT H

Progressive Direct Mail Advertising
2089 West 2300 South ★ Salt Lake City, Utah 84119
Phone (801) 973-8888

INVOICE

SOLD TO:

Utah Republican Party
643 East 400 South #A
Salt Lake City, Utah 84102

INVOICE NO: 35157
INVOICE DATE: 30 October 1986
YOUR P.O. NO.
TERMS Net

Please Pay This Amount

QUANTITY	DESCRIPTION	AMOUNT
	Jim Hansen "Is There Really A Difference"	
43484	Labeling, sorting and bulk mail handling	434.84
	Wayne Owens Door-Tom Shimizu	
77211	Labeling, sorting and bulk mail handling	772.11
	Tom Shimizu-The Company He Keeps	
118933	Labeling, sorting and bulk mail handling-with set up	1214.33
	Tom Shimizu-Blue Jake Garn Letter	
29901	Labeling, sorting and bulk mail handling	299.01
	Tom Shimizu-Red 1 + 1 Letter	
30526	Labeling, sorting and bulk mail handling	305.26

Paid
10-31-86
$3025.55
5038

POSTAGE RESERVE	
POSTAGE USED	
POSTAGE DUE * OR CREDIT	

RESALE NO.

SALES TAX Exempt

* POSTAGE DUE OR CREDIT

TOTAL INVOICE 3025.55

Payment is due upon completion of work. Purchaser agrees to pay interest and service charges at the rate of 1 1/2% PER MONTH, WHICH IS AN EFFECTIVE RATE OF 18% PER ANNUM, on all accounts over 30 days from date of invoice. In the event of default of payment of items shown above, the purchaser agrees to pay collection fees including reasonable attorney fees.

0 0 0 4 0 7 8 2 8 8

PS Form 3602, Apr. 1985 10-918A FOR ZONE RATED MAIL USE FORM 3605 Wayne Owens Door - Shimizu

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL[illegible] Complete all items by typewriter, pen or indelible pencil. Prepare duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, utah 84119	10-21-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit both
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category (See DMM 128)
- ☐ Letters
- ☒ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0284 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
66331	1883	66			

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
1039 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 66331	Rate Per Piece $ .071	Postage 4716.60
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 4716.60
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. **TOTAL POSTAGE** (9 plus 10) where applicable) Total Postage $ 4716.60

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed [illegible] (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred) Lynette Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp [illegible]

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-[illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 150

10/21/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7736 UTAH REPUBLICAN PARTY
(P.D.M.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
66	0	3	3RD	0.450300	35.26	66331	1881.3

PER PIECE CHARGE FOR 5 DIGIT PRESORT $4709.50 66331 PIECES AT 0.07¢

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS $10[illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

PS Form 3602, Apr. 1985 10-921 FOR ZONE RATED MAIL USE FORM 3605 Tom Shimizu

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL[illegible] all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. **1863**

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-22-86		

Check applicable box

2nd Class
- ☐ International Class
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class / 3rd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

both

Processing Category (See DMM 128)
- ☐ Letters
- ☒ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece .0303 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
10880	330	8			1

Name and Address of Permit Holder (Include ZIP Code)

Telephone No. 972-8288

Utah Republican Party
643 East 400 South
S[illegible] Lake City, Utah 84102

☒ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 10880	Rate Per Piece $ .071	Postage 772.48
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 772.48
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third-class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable) — Total Postage $ 772.48

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Shelly Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 [illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 113

10/22/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7786 UTAH REPUBLICAN PARTY
(U.R.P.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
8			SRD	0.451500	35.44	10880	307.02

PER PIECE CHARGE FOR 5 DIGIT PRESORT $772.48 10880 PIECES AT 0.071

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS $
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

INVOICE

INVOICE

1226

P.O. Number _____

...utter Street • Murray, Utah 84107 • (801) 266-5757

Shimizu For Congress
Utah State Republicah Party
643 East 400 South 84102

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct 27, 1986

CUSTOMER PURCHASE ORDER NO: _____

TERMS: _____

Description	Amount
48,000 You Can Tell alot about A Man by the Company He Keeps(11" x 17" Brochures).....	...$2880,00
36,500 Garn Letters(Blue& Black)	...$2190.00
(Pre P.S. Statement: Plate Change after running 14,000 on 1 side: Cost of Paper/Time & Plate Change).....	...$153.00
Garn/Shimizu Letter(Red/Black) 48,000	..$2880.00
Typesetting/Pasteup/PMT/Design of Garn Brochures	...92.00

TERMS: NET 30 DAYS. A FINANCE CHARGE of 1½% per month (18% ANNUAL RATE) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

Sub Total	$8195.00
Tax	471.21
Total	$8666.21

RECEIVED BY _____
CUSTOMER SIGNATURE

0004078229004

EXHIBIT I

PS Form 3602, Apr. 1985 10-929 FOR ZONE RATED MAIL USE FORM 3605 Shimizu - The Company #26 keeps 4

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL[illegible]ete all items by typewriter, pen or indelible p[illegible]. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. 1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-23-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

both

Processing Category (See DMM 128)
- ☐ Letters
- ☒ Flats
- ☐ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0286 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
55239	1580	46			3

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☒ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

☐ Check if non-profit under 623. DMM*

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 55239	Rate Per Piece $ .071	Postage 3921.97
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 3921.97
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

12. TOTAL POSTAGE (9 plus 10) where applicable — Total Postage $ 3921.97

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed; and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)

Shelley Nelson

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-477-069/39231 FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

SHIMIZU
"THE COMPANY HE KEEPS"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 57

10/23/86

SLC, UT 84199-9519 PERMIT NO. 1663

NANCE # 49-7786 UTAH REPUBLICAN PARTY (P.D.M.A.)

FLAT SIZE-ALL mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	NUMBER OF PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
45	0	3	3RD	0.452700	35.34	55239	1562.[illegible]

PER PIECE CHARGE FOR 5 DIGIT PRESORT +3921.[illegible] 55239 PIECES AT 0.07[illegible]

(Received for dispatch by) (Signature of Weisner)

PS FORM 3607 FACSIMILE. YOUR ACCOUNT BALANCE IS $[illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2603

PS Form 3602, Apr. 1985 10-920R FOR ZONE RATED MAIL USE FORM 3605

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MAIL[illegible]plete all items by typewriter, pen or indelible [illegible]
Prep[illegible]cate if receipt is desired. Check for instructions [illegible] your postmaster regarding box labeled "RCA Offices."

Shipping The Company He Keeps

1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-24-86		

Check applicable box

- ☐ International
- 1st Class
  - ☐ ZIP + 4 Nonpresort
  - ☒ ZIP + 4 Presort
  - ☐ Carrier Route
  - ☐ Presort First-Class
  - ☐ Single Piece
- 2nd Class
  - ☐ Newspapers and magazines entered at the applicable third-class rate
- 3rd Class
  - ☐ Carrier Route
  - ☐ 5-digit
  - ☒ Basic
  - ☐ Single Piece both
- 4th Class
  - ☐ Library Rate
  - ☐ Special 4th Class Single Piece
  - ☐ Presort Special 4th Class
  - ☐ Other (Specify)

Processing Category *(See DMM 128)*

- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0284 lbs

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
38843	1103	33			2

Name and Address of Permit Holder *(Include ZIP Code)*

Utah State Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared *(If other than permit holder)*

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent *(If other than permit holder)*

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces	Rate Per Piece $	Postage
	7. Basic	No. Qual. Pieces 38834	Rate Per Piece .071	Postage 2757.21
	8. Rate Category	No. of Pieces 9	Rate Per Piece .085	Postage .77
	9. SUBTOTAL (1 through 8)		$	Postage
	10. Additional Postage Payment *(State reasons for additional postage payments)*	No. Pieces	Rate/Piece $	Postage 2757.98

11. ☐ Check if applicable third class bulk piece rate is paid by meter. *(Form 3602-PC required)*

TOTAL POSTAGE *(9 plus 10)* where applicable) — Total Postage $ 2757.98

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed; and (3) This is not a [illegible] other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken [illegible] on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent *(Both principal and agent are liable for any postage deficiency incurred)*

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Postage Stamp (If required)

Signature of Weigher

Time A.M. P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-[illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

Shimizu
"THE Company
HE KEEPS"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE

No. 180

10/24/86

P.O. UT 84199-9519

PERMIT NO. 1863

FINANCE # 49-7786

UTAH REPUBLICAN PARTY
(P.U.R.A.)

FLAT SIZE-All mail normally processed through flat cases

SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
03	0	2	3RD	0.45300	35.34	38043	1077.3[illegible]

PER PIECE CHARGE FOR 5 DIGIT PRECORT [illegible] 38034 PIECES AT 0.0[illegible]

BASIC RATE RESIDUAL PIECES CHARGE $0.77 9 PIECES AT 0.[illegible]

TOTAL POSTAGE FOR MAILING $[illegible]

(Received for dispatch by)

(Signature of Weigher)

PS FORM 3607 FACSIMILE

[illegible] ACCOUNT BALANCE IS [illegible]
[illegible] NOT INCLUDE LATEST DEPOSIT

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2003

PS Form 3602 Apr. 1985 10-929C FOR ZONE RATED MAIL USE FORM 3605 ZHM12U THE Company

Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MA[illegible]plete all items by typewriter, pen or indelible [illegible]
Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. HE KEEPS 11
1863

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
~~Salt Lake City, Utah 84119~~	10-24-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class / 3rd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate
- ☐ Carrier Route
- ☐ 5-digit
- ☒ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

Processing Category *(See DMM 128)*
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0292 lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
12690	371	9			1

Name and Address of Permit Holder *(Include ZIP Code)*

Tom Shimizu
Utah State Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No.

☒ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared *(If other than permit holder)*

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent *(If other than permit holder)*

PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 12690	Rate Per Piece $ .071	Postage 900.99
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage
	10. Additional Postage Payment *(State reasons for additional postage payments)*	No. Pieces	Rate/Piece $	Postage 900.99

11. ☐ Check if applicable third class bulk piece rate is paid by meter. *(Form 3602-PC required)*

SALT LAKE CITY UTAH OCT 24 1986 USPS

TOTAL POSTAGE *(9 plus 10)* where applicable) Total Postage $ 900.99

*The signature of [illegible] certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being [illegible] (3) This is not [illegible] with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent *(Both principal and agent are liable for any postage deficiency incurred)*

Lynette Nelson

Telephone No. 972-8268

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp [illegible]

Signature of Weigher

Time
A.M.
P.M.

PS Form 3602, Apr. 1985 *U.S. G.P.O. 1985-[illegible]-16 FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

SHIMRU "The Company He Keeps"

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 178

10/24/86

SLC, UT 84199-9519 PERMIT NO. 1863

FINANCE # 49-7786 UTAH REPUBLICAN PARTY (P.D.M.A.)

FLAT SIZE-All mail normally processed through flat cases

NUMBER OF SACKS	NUMBER OF TRAYS	NUMBER OF OTHER CONTAINERS	CLASS OF MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	TOTAL PIECES	TOTAL POUNDS
9			3RD	0.447300	35.77	12690	354.76

PER PIECE CHARGE FOR 5 DIGIT PRESORT $900.99 12690 PIECES AT 0.071

(Received for dispatch by) (Signature of Weisner)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS: ~ $7021 [illegible]
(MAY NOT INCLUDE LATEST DEPOSIT)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

PS Form 3602, Apr. 1985 10-929D FOR ZONE RATED MAIL USE FORM 3605 Shimizu

U.S. Postal Service
STATEMENT OF MAILING WITH PERMIT IMPRINTS

MA[illegible]mplete all items by typewriter, pen or indelible pencil. Prepare in duplicate if receipt is desired. Check for instructions from your postmaster regarding box labeled "RCA Offices."

Permit No. THE Company ITE 1863 KEEPS

Post Office of Mailing	Date	Receipt No.	Mailing Statement Sequence No.
Salt Lake City, Utah 84119	10-27-86		

Check applicable box

1st Class
- ☐ International
- ☐ ZIP + 4 Nonpresort
- ☐ ZIP + 4 Presort
- ☐ Carrier Route
- ☐ Presort First-Class
- ☐ Single Piece

2nd Class
- ☐ Newspapers and magazines entered at the applicable third-class rate

3rd Class
- ☐ Carrier Route
- ☒ 5-digit
- ☐ Basic
- ☐ Single Piece

4th Class
- ☐ Library Rate
- ☐ Special 4th Class Single Piece
- ☐ Presort Special 4th Class
- ☐ Other (Specify)

piece

Processing Category (See DMM 128)
- ☐ Letters
- ☐ Flats
- ☒ Machinable Parcels
- ☐ Irregular Parcels
- ☐ Outside Parcels

Weight of a single piece: .0280 ___ ___ lbs.

RCA Offices:

TOTAL IN MAILING		NUMBER OF			
Pieces	Pound	Sacks	Trays	Pallets	Other Containers
12161	341	11			1

Name and Address of Permit Holder (Include ZIP Code)
Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

Telephone No. 972-8288

☐ Check if non-profit under 623. DMM*

Name and Address of Individual or Organization for which mailing is prepared (If other than permit holder)

☐ Check if non-profit under 623. DMM*

Name and Address of Mailing Agent (If other than permit holder)
PROgressive Direct Mail Advertising
2089 West 2300 South
Salt Lake City, Utah 84119

POSTAGE COMPUTATION

Pound Rate	1. Pound Rate Postage Charge	No. Pounds	Rate/Pound $	Postage
Piece Rates	2. ZIP + 4 Presort	No. Qual. Pieces	Rate Per Piece $	Postage
	3. Presort First Class	No. Qual. Pieces	Rate Per Piece $	Postage
	4. ZIP + 4 Nonpresort	No. Qual. Pieces	Rate Per Piece $	Postage
	5. Carrier Route	No. Qual. Pieces	Rate Per Piece $	Postage
	6. 5-digit	No. Qual. Pieces 12161	Rate Per Piece $ .071	Postage 863.43
	7. Basic	No. Qual. Pieces	Rate Per Piece $	Postage
	8. Rate Category	No. of Pieces	Rate Per Piece $	Postage
	9. SUBTOTAL (1 through 8)			Postage 863.43
	10. Additional Postage Payment (State reasons for additional postage payments)	No. Pieces	Rate/Piece $	Postage

11. ☐ Check if applicable third class bulk piece rate is paid by meter. (Form 3602-PC required)

SALT LAKE CITY UTAH OCT 27 1986

12. TOTAL POSTAGE (9 plus 10) where applicable) → Total Postage $ 863.43

*The signature of a nonprofit mailer certifies that: (1) The mailing does not violate section 623.5 DMM and (2) Only the mailer's matter is being mailed, and (3) This is not a cooperative mailing with other persons or organizations that are not entitled to special bulk mailing privileges; and (4) This mailing has not been undertaken by the mailer on behalf of or produced for another person or organization that is not entitled to special bulk mailing privileges.

Willful entry of false, fictitious or fraudulent statements or representations hereon punishable by fine up to $10,000 or imprisonment up to 5 years, or both (18 USC 1001).

Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred)
Shelley Nielsen

Telephone No. 972-8288

I CERTIFY that this mailing has been inspected to verify that it qualifies for the rate of postage being paid, and that it is properly prepared (and presorted where required) and that the statement of mailing has been verified and the necessary annual fee has been paid.

Round Stamp (Required)
SALT LAKE CITY UTAH OCT 28 1986

Signature of Weigher

Time A.M. P.M.

PS Form 3602 Apr. 1985 [illegible] FINANCIAL DOCUMENT – FORWARD TO FINANCE OFFICE

Graphics

6209 Stratler Street • Murray, Utah [redacted] • (801) 266-5757

INVOICE

P.O. Number 1213

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

DATE: Oct. 11, 1986

CUSTOMER PURCHASE ORDER NO: _____

TERMS: C.O.D.

Description	Amount
Tom Shimizu for Congress	
-75,600 2-Color Brochures (22" x 8½") #70 Stock	
-75,600 2-Color Brochures (11" x 17") #70 Stock	
Printing/Folding @ 6¢ ea	$9072.00
Typesetting/Art/Design & Pasteup	217.00

TERMS: NET 30 DAYS. A **FINANCE CHARGE** of 1½% per month (**18% ANNUAL RATE**) will be charged to all past due accounts. Customer agrees to pay all costs of collection and reasonable attorneys fees should collection become necessary.

RECEIVED BY _____
CUSTOMER SIGNATURE

Sub Total	$9289.00
Tax	$534.11
Total	$9823.11

0004078290912

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH SUITE A 801-533-8777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4998

Oct. 24 19 86

31-5
1240

PAY Nine Thousand Eight Huddred Twenty Three and 11/100 Dollars------ DOLLARS $ 9,823.11

TO THE ORDER OF
Communication Graphics
6209 Statler Street
Murray, UT 84107

NOT NEGOTIABLE

⑈124000054⑈ 01 13550 8⑈

UTAH REPUBLICAN PARTY

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO	AMOUNT

TYPE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		SOCIAL SECURITY TAX	WITHHOLDING U. S. INC. TAX	S.D.I.	STATE INCOME TAX			

0782913

w

UTAH REPUBLICAN PARTY 90119-1-9
643 EAST 400 SOUTH SUITE A 801-533-8777
04/73 SALT LAKE CITY, UTAH 84102

ZIONS FIRST NATIONAL BANK
First South Office
102 South Main
Salt Lake City, Utah 84101

4998

Oct. 24 19 86

31-5
1240

PAY Nine Thousand Eight Hundred Twenty Three and 11/100 Dollars------ DOLLARS $ 9,823.11

TO THE ORDER OF
Communication Graphics
6209 Statler Street
Murray, UT 84107

$ L S
T# 6
GRANITE DISTRICT CREDIT UNION

⑈004998⑈ ⑈124000054⑈ 01 13550 8⑈ ⑈00009823⑈

CLARKE CHECKS

Shimizu

THE Company HE Keeps

U. S. POSTAL SERVICE
WEIGHING AND DISPATCH CERTIFICATE NO. 13

10/28/86

SLC, UT 84199-9519 PERMIT NO. 1060

FINANCE # 49-7786 UTAH REPUBLICAN PARTY

FLAT SIZE-All mail normally processed through flat cases

SACKS	NUMBER OF TRAYS	OTHER CONTAINERS	CLASS MAIL	WEIGHT OF A SINGLE PIECE	PIECES IN A POUND	NUMBER OF TOTAL PIECES	TOTAL POUNDS
11			3RD	0.446300	85.81	12161	[illegible]

PER PIECE CHARGE FOR 5 DIGIT PRESORT $863.43 12161 PIECES AT 0.07¢

(Received for dispatch by) (Signature of Weigher)

PS FORM 3607 FACSIMILE YOUR ACCOUNT BALANCE IS [illegible]
(MAY NOT INCLUDE LATEST DEPOSITS)

UTAH REPUBLICAN PARTY
643 E. 400 SOUTH #A
SALT LAKE CITY, UT 84102-2803

Progressive Direct Mail Advertising
2089 West 2300 South ★ Salt Lake City, Utah 84119
Phone (801) 972-8288

INVOICE

SOLD TO:

Utah Republican Party
643 East 400 South #A
Salt Lake City, Utah 84102

INVOICE NO: 35157
INVOICE DATE: 30 October 1986
YOUR P.O. NO.
TERMS Net

Please Pay This Amount

QUANTITY	DESCRIPTION	AMOUNT
	Jim Hansen "Is There Really A Difference"	
43484	Labeling, sorting and bulk mail handling	434.84
	Wayne Owens Door-Tom Shimizu	
77211	Labeling, sorting and bulk mail handling	772.11
	Tom Shimizu-The Company He Keeps	
118933	Labeling, sorting and bulk mail handling-with set up	1214.33
	Tom Shimizu-Blue Jake Garn Letter	
29901	Labeling, sorting and bulk mail handling	299.01
	Tom Shimizu-Red 1 + 1 Letter - Garn	
30526	Labeling, sorting and bulk mail handling	305.26

Paid
10-31-86
$3025.55
5038

POSTAGE RESERVE	
POSTAGE USED	
POSTAGE DUE * OR CREDIT	

RESALE NO.

SALES TAX Exempt

* POSTAGE DUE OR CREDIT

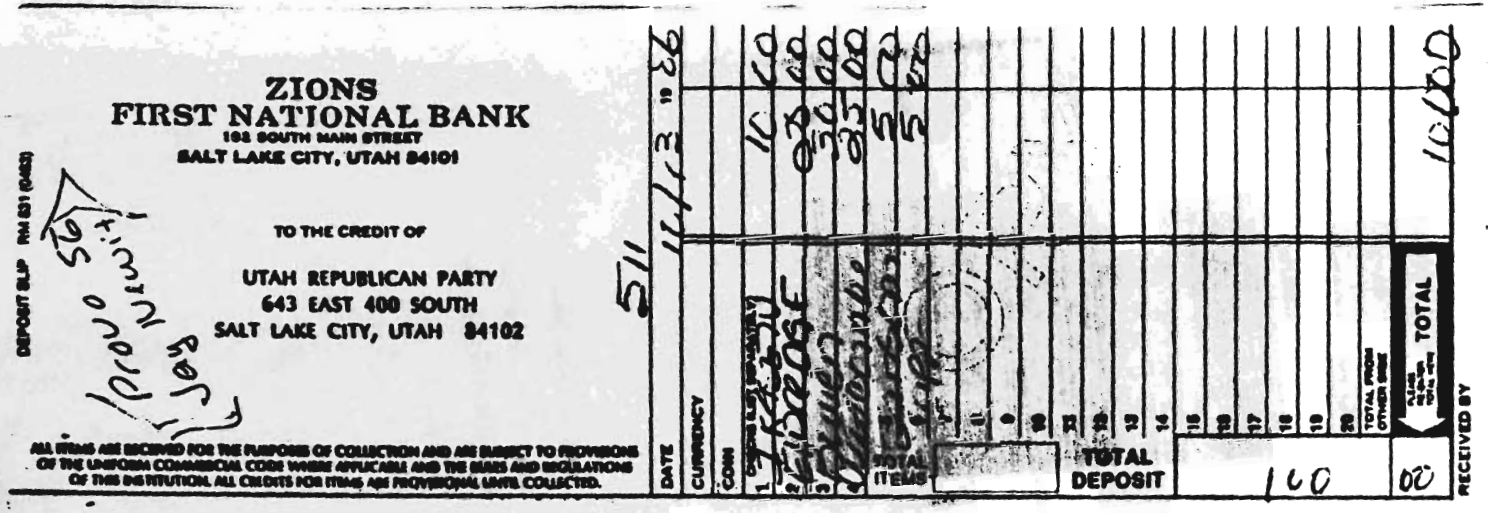
TOTAL INVOICE 3025.55

Payment is due upon completion of work. Purchaser agrees to pay interest and service charges at the rate of 1 1/2% PER MONTH, WHICH IS AN EFFECTIVE RATE OF 18% PER ANNUM, on all accounts over 30 days from date of invoice. In the event of default of payment of items shown above, the purchaser agrees to pay collection fees including reasonable attorney fees.

0004078291 5

0 0 4 0 7 8 2 9 1 6

EXHIBIT J



ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FM 831 (5/82)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

Provo Utah

ALL ITEMS ARE RECEIVED FOR THE PURPOSE OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 5 11 82
CURRENCY 10 00
COIN
1 [illegible] 25 00
2 [illegible] 30 00
3 [illegible] 35 00
4 [illegible] 50 00
5 [illegible] 5 00
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
TOTAL FROM OTHER SIDE
TOTAL ITEMS
TOTAL DEPOSIT 160 00
TOTAL
RECEIVED BY

:124000054: 01 13550 8#

00407820 17

ALLAN R. WISCOMBE 581
ELIZABETH J. WISCOMBE
1232 EAST MILLBROOK V [redacted]-4753
BOUNTIFUL, UT 84010

4183

Oct 7 1986 75-[redacted]

Pay to the order of Utah GOP $ 25 00/100

Twenty Five and 00/100 DOLLARS

IBM Rocky Mountain Employees Federal Credit Union
430 E. South Temple, Salt Lake City, Utah 84111

Payable thru FIRST BANK (NA) • NORTHFIELD, MN

PURPOSE Allan R Wiscombe

⑆091901480⑆45000998 20800⑈ 4183

1356

WILLIAM E. BOWEN, Jr. 379 V
664 E. COBBLESTONE LN. 561-8961
MIDVALE, UT 84047

OCT 8 1986 97-154/1240

Pay to the order of UTAH GOP $ 30.00

THIRTY & NO/100 Dollars

EAST MURRAY OFFICE
VALLEY BANK & TRUST COMPANY
5565 SOUTH 9TH EAST, SALT LAKE CITY, UTAH 84117

For Wm E Bowen Jr

⑆124001545⑆07 133057⑈ 1356

Rocky Mountain Bank Note ® PEERLESS

Harold D. or Anna S. Eldredge
946 Windsor Street 521-6863
12/75 Salt Lake City, Utah 84105

600

31-6/1240

30 Oct 1986

Pay to the Order of Utah Republican Party $ 25 00

Twenty Five and 00/100 Dollars

ZIONS FIRST NATIONAL BANK
SEVENTH EAST OFFICE 701 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

For Harold D Eldredge

⑆124000054⑆ 08 35132 2⑈ 0600

9990 ⑈42 22409 251⑆12100007291⑆

First Security Bank
MIDWAY OFFICE
MIDWAY, UTAH 84049
NATIONAL ASSOCIATION

Pay to the order of Utah Republican Party $ 10 00

10/9 86

HENRY L. ISAKSEN 8-85
P. O. BOX 429 PH. 654-4039
MIDWAY, UTAH 84049

31-1 152
1240

999

232

OLIVER C. OR ZERMA TRIPP
4334 BEECHWOOD ROAD 268-2161
SALT LAKE CITY, UTAH 84107

480

July 2 19 86

31-4
1240

PAY TO THE ORDER OF Equitable Credit Comm $ 5.00

Five and 00/100 DOLLARS 00 CENTS

REDWOOD ROAD OFFICE
CONTINENTAL BANK

Zerma C Tripp

⑆124000041⑆0232 ⑆4240681⑈

JOHN S. SANSOM 780
OR BEVERLY H. SANSOM
DL 9822564
2936 EAST 3835 SOUTH 272-0134
SALT LAKE CITY, UT 84109

1087

10-3 1986

97-261/1243

Pay to the order of Utah Co-Op $ 15.00

Fifteen and 00/100 Dollars

COTTONWOOD SECURITY BANK
3826 SOUTH 2300 EAST, SALT LAKE CITY, UTAH 84109

For Vacation

Beverly H Sansom

⑆124302631⑆ 30811 ⑈ 1087

RETIRED?
Ask about
Guaranteed Social Security
Deposit

Deposited with
ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

8408ZFN10/15/86#127 $653.59 D 1135508#

98-8171 Always obtain an official receipt when making a deposit.

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

1004

DATE	CURRENCY	COIN	CHECKS AND OTHER ITEMS		TOTAL
19 86			1 Utah Power	323 75	
October 15			2 Weyden	329 78	653 53
			3		
			4		
			5		
			6		
			7		
			8		
			9		
			10		
			11		
			12		
			13		
			14		
			15		
			16		
			17		
			18		
			19		
			20		
			TOTAL FROM OTHER SIDE		
			TOTAL ITEMS		TOTAL DEPOSIT

RECEIVED BY

BE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑆124000054⑆ 01 13550 8⑈

0 0 0 2 8 7 0 4 0 0 0

Mike Christensen
For County Attorney Committee
1716 Paulista Way 942-5866
04/86 Sandy, Utah 84092

148

31-8/1240

10-14-1986

Pay to the Order of Utah Republican Party $23.75

Three hundred twenty-three 75/100 Dollars

ZIONS FIRST NATIONAL BANK
BROADWAY OFFICE 310 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

For 4450 Letter

⑈124000054⑈ 03 40486 0⑈ 0148

JED W. OR DEON C. WASDEN 758
151 OLYMPUS ST. 255-1643
MIDVALE, UT 84047

323

Oct 15 1986

31-4/1240

Pay to the order of Republican Party $329.84

Three Hundred Twenty Nine 84/100 Dollars

MIDVALE OFFICE
CONTINENTAL BANK

For

⑆124000041⑆0323 3051568 7⑈

RETIRED?
Ask about
Guaranteed Social Security
Deposit

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

84082FN10/15/86#122 $64,425.00 D 1135508#

99-0171 Always obtain an official receipt when making a deposit.

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ITEMS ARE RECEIVED FOR THE PURPOSE OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	CURRENCY	COIN	CHECKS (LIST SEPARATELY)	
10-15			1 64425 00	
			2 Nat'l Rep. Sen. Comm.	64000 00
			3	
			4	
			5	
			6	
			7	
			8	
			9	
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			13	
			14	
			15	
			16	
			17	
			18	
			19	
			20	
			TOTAL FROM OTHER SIDE	
			TOTAL	64,425 00

TOTAL ITEMS

TOTAL DEPOSIT

RECEIVED BY

⑆240000541⑆ 01 13550 8⑈

9004078292

JAKE GARN RE-ELECTION COMMITTEE
1815 H STREET, NW., SUITE 1000
WASHINGTON, D.C. 20006

1338

Oct 13 19 86

31-7350
1240

PAY TO THE ORDER OF Utah State Republican Party $ 4425 cc

Four Thousand Four Hundred Twenty Five DOLLARS

CSB TOWER OFFICE
Commercial Security Bank
50 S MAIN
SALT LAKE CITY, UTAH 84101

FOR

C J Mellon

⑈001338⑈ ⑆124000737⑆ 5800124617⑈

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CORPORATE ESCROW ACCOUNT
OFFICE FACILITIES
440 FIRST STREET, N.W., 6TH FLOOR
WASHINGTON, D.C. 20001

D.C. National Bank ★★★ DISTRICT OF COLUMBIA NATIONAL BANK

1443

October 8 19 86

PAY *Sixty thousand and 00/00* ********** DOLLARS $ *60,000.00*

TO THE ORDER OF
Utah REpublican State Central Committee
643 East 400 South
Salt Lake City, Utah 84102

⑈0000144 3⑈ ⑆054001201⑆ ⑈268567 1⑈

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

8408ZFN10/15/86#121 $100.00 D 1135508#

99-0171 Always obtain an official receipt when making a deposit.

DEPOSIT SLIP RM 831 (0483)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

454

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 19 86	October 15		
CURRENCY		75	00
COIN		25	00
CHECKS (SEPARATELY) 1	Hall		
2			
3			
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6			
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9			
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11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
TOTAL FROM OTHER SIDE			
TOTAL ITEMS		TOTAL DEPOSIT	1 00

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

00040782924

★ TIMOTHY A. OR LOUISE TATE
UDL 10967898 UDL A182221
408 South Moss Hill Drive 292-1896
12/68 Bountiful, Utah 84010

5977

31-8/1240

10-12 1986

PAY TO THE ORDER OF UTAH REPUBLICAN PARTY $25 00/100

Twenty-five 00/100 DOLLARS

ZIONS FIRST NATIONAL BANK
SEVENTH EAST OFFICE 701 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

FOR

Timothy A. Tate

⑆124000054⑆ 08 32397 4⑈ 5977

c 0 0 4 b 7 8 2 9 2 3 c

HENNING HOJ
4443 WANDER LANE 278-2195
SALT LAKE CITY, UTAH 84117

10 70 19 86

848

31-121/1240

Pay to the order of UTAH REPUBLICAN PARTY $ 75 00

SEVENTY FIVE 00/100 Dollars

First Interstate Bank

First Interstate Bank of Utah
Industrial Office
250 West 2100 South
Salt Lake City, Utah 84115

For DONATION

Henning Hoj

⑆124001215⑆ 08 11222 9⑈ 0848

OP-3

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

8408ZFN10/15/86#124 $358.00 D 1135508#

99-8171 Always obtain an official receipt when making a deposit

DEPOSIT SLIP RM 831 (0489)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	10 15 '86			
CURRENCY	115 00			
COIN				
1 CHECKS (LIST SEPARATELY)	Gilliam	20	00	
2	Seymour	100	00	
3	Sears	25	00	
4	NEBAssoc	12	50	
5	Market	12	50	
6	Sapp Food	25	00	
7	Forsyth	12	50	
8	Jenkins	25	00	
9	Hart Tire	50	00	
10	Conway Elec	25	00	
11	Dave Child	20	00	
12	Taft	20	00	
13	Child	8	50	
14				
15				
16				
17				
18				
19				
20 TOTAL FROM OTHER SIDE				
TOTAL ITEMS		TOTAL DEPOSIT		358 00

RECEIVED BY

Dfd

⑆124000054⑆ 01 13550 B⑈

00040782926

DANIEL H. MARKEL III 486
1526 N. DIXIE DOWNS RD. LOT 21 OR 14
ST. GEORGE, UT 84770

10-10 19 86

366

31-2/1240

Pay to the Order of GOVERNOR'S CLUB $ 12.50

Twelve and 50/100 Dollars

First Interstate Bank
of Utah, NA
St. George Office
791 South Bluff Street
St. George, Utah 84770

For Gov. Club Fee

⑆124000025⑆ 58 10986 9⑈ 0366

E. D. OR LINDA C. SAPPINGTON - 7-78

8089

2961 JACOB HAMBLIN DR. 673-6290
P.O. BOX 1015
ST. GEORGE, UTAH 84770

10-10 19 86

97-215/1243

Pay to the order of Governor's Club $ 25.00

Twenty Five and 00/100 Dollars

Sun Capital Bank
60 SOUTH 100 EAST
ST GEORGE, UTAH 84770

For

⑆124302150⑆ 0031 862 0⑈ 8089

937

★Stanley S. or Sue Forsyth
3271 Maya Circle 628-1229
03/79 St. George, Utah 84770

97-65/1243

Oct. 10, 1986

Pay to the Order of Governor's Club $ 12.50

Twelve and 50/100 Dollars

ZIONS FIRST NATIONAL BANK
ST. GEORGE OFFICE P.O. BOX 430
ST. GEORGE, UTAH 84770

For Economic

⑆124300958⑆ 34 38115 2⑈ 0937

186

DR. RICHARD C. JENNINGS 6-86
294 E. TABERNACLE 673-3081
ST. GEORGE, UTAH 84770

10/10 19 86 229

Pay to the Order of Governor's Club $ 25

Twenty-Five and 00/100 Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
ST. GEORGE OFFICE
410 EAST TABERNACLE ST. GEORGE, UTAH 84770

For Economic

⑆124000012⑆ 229 12174 18⑈ 0186

⑆000407829927

Henry L. Whiffen
Diane T. Whiffen
North Windsor Drive 225-4030
05/81 Provo, Utah 84604

97-874/1243 1323

10-14 19 86

PAY TO THE ORDER OF Utah Governor's Club — $20.00

Twenty no/100 DOLLARS

ZIONS FIRST NATIONAL BANK
OREM OFFICE P.O. BOX 130
OREM, UTAH 84057

For

Henry L Whiffen

⑈124302749⑈ 71 30360 6⑈ 1323

R. STEVE CREAMER 580
JANET CREAMER
824 S. CAMBRIDGE 673-9481
P. O. BOX 1094
ST. GEORGE, UTAH 84770

4719

10/8 19 86 97-215/1243

Pay to the order of Governors Club $ 100.00

Dollars

Sun Capital Bank
ST. GEORGE OFFICE
80 SOUTH 100 EAST • ST. GEORGE, UTAH 84770

For

⑈124302150⑈0032 978 8⑈ 4719

Rocky Mountain Bank Note
CapitCheck-2

ROBERT N. SEARS
CLARA B. SEARS
P. O. BOX 1107
ST. GEORGE, UTAH 84770

4030

Oct 8 19 86 97-95/1243

679

Pay to the order of St. George Hilton $ 25.00

Twenty Five and no/100 Dollars

BANK OF ST. GEORGE OFFICE
ZIONS FIRST NATIONAL BANK
P.O. BOX 430
ST. GEORGE, UTAH 84770

For

⑈124300958⑈ 34 38338 0⑈ 4030

Rocky Mountain Bank Note AA-D

NEIL L. OR N. MARLENE BLACKBURN
NLB ASSOCIATES
234 EAST ST. GEORGE BLVD. 628-8448
P.O. BOX 1727
ST. GEORGE, UTAH 84770

324

10 Oct 19 86 97-95/1243

$ 13.50

DOLLARS

ZIONS FIRST NATIONAL BANK
ST. GEORGE OFFICE P.O. BOX 430
ST. GEORGE, UTAH 84770

⑈124300958⑈ 34 13195 3⑈ 0324

0 0 0 4 0 7 8 2 2 0 2 8

RODEWAY INN
260 EAST ST. GEORGE BLVD. 673-6161
ST. GEORGE, UTAH 84770

№ 1240

DIXIE STATE BANK
ONE SOUTH MAIN
ST. GEORGE, UTAH 84770
97-123/1243

1089

PAY Twenty Five 00/100

DATE 10/10/86 AMOUNT $ 25.00

TO THE ORDER OF Governor Club

Paige Dettman

⑈000240⑈ ⑆124301232⑆01 02751 5⑈

PROJECT CONTROL, INC.
3809 SOUTH 300 WEST 801-262-9315
03/82 SALT LAKE CITY, UTAH 84115

3940

Oct. 13 19 86 31-5/1240

PAY TO ORDER OF Utah Governor's Club $ 20.00

Twenty Dollars and no/100---------- DOLLARS

ZIONS FIRST NATIONAL BANK
HEAD OFFICE P.O. BOX 30709
SALT LAKE CITY, Utah 84130

David L. Clark

⑈003940⑈ ⑆124000054⑆ 02 17215 3⑈

CLARKE CHECKS

DALE R. TATE, M.D., P.C. 9-86
P. O. BOX 703
PLEASANT GROVE, UTAH 84062

1048

87-228/1243

Oct 13 1986

PAY TO THE ORDER OF Utah Elementary Clubs $ 30.00

Thirty 10/100 DOLLARS

WASATCH BANK
OF PLEASANT GROVE
228 SOUTH MAIN PLEASANT GROVE, UTAH 84062

FOR Uniforms Assessment Oct 13 1986

⑈000784⑈ ⑆324070619⑆ 00970 9⑈

0004078

AAA TIRE & SERVICE CENTER
LaRell Rawlings
Firestone 776 SOUTH BLUFF 673-6105
ST. GEORGE, UTAH 84770
185

2692

31-7061/3240

Pay to the order of Uniforms Club 10-10-86 $50.00

Fifty and no/100 Dollars

Williamsburg Savings Bank
St. George Office
1 East Tabernacle • St. George, Utah 84770

memo

Signed Linda Rawlings

⑈002692⑈ ⑆324070619⑆090 101818⑈

0 0 0 4 0 7 8 2 0 3 1

3941

PROJECT CONTROL, INC.
3809 SOUTH 300 WEST 801-262-9315
03/82 SALT LAKE CITY, UTAH 84115

Oct. 13 19 86 31-6/1240

PAY TO ORDER OF Utah Governor's Club $ 8.50

Eight dollars and .50/100---------- DOLLARS

ZIONS FIRST NATIONAL BANK
HEAD OFFICE P.O. BOX 30709
SALT LAKE CITY, Utah 84130

David L Child

⑈003941⑈ ⑆124000054⑆ 02 172 5 3⑈

CLARKE CHECKS

8274

2132 Yuma Street 466-0285
09/66 Salt Lake City, Utah 84109

31-8/1240

October 10 1986

PAY TO THE ORDER OF Utah Republican Party $15.00

Fifteen DOLLARS

ZIONS FIRST NATIONAL BANK
HEAD OFFICE P.O. BOX 30709
SALT LAKE CITY, UTAH 84130

FOR Donation Edward A. Folland

⑆124000054⑆ 02 37084 9⑈ 0150

R. H. GOODWIN 786
OR JULIA B. GOODWIN
2387 REDONDO AVE. 467-5596
SALT LAKE CITY, UT 84108

115

Oct 7 1986

31-4/1240

Pay to the order of Republican Party Ellis 30.00

Thirty & no/100 Dollars

PARLEY'S VIEW OFFICE
CONTINENTAL BANK
2243 East 2100 South
Salt Lake City, Utah 84109

For

⑆124000041⑆0115 09059263⑈

Rocky Mountain Bank Note 8 Wind Sports

LARRY O. LE BARON 984
BONNIE C. LE BARON
8 WEST 810 SOUTH 115-6 635-2080
HURRICANE, UTAH 84737

880

Oct 10 1986

31-7061/3240

Pay to the order of Utah Republican Party $ 10.00

Ten and no/100 Dollars

Williamsburg Savings Bank
Hurricane Office
30 South 200 West • Hurricane, Utah 84737

For

Bonnie C. LeBaron

⑆324070619⑆0906 19066519⑈ 0880

Rocky Mountain Bank Note 8

DOROTHA G. OR VERL A. WALKER
325 OAK LANE
KAYSVILLE, UTAH 84037

285

10-6 1986

97-74/1243

160

Pay to the order of UTAH GOP $ 30.00

THIRTY & 00 Dollars

BARNES BANKING CO.
33 SOUTH MAIN
KAYSVILLE, UTAH 84037

For

Verl a Walker

⑆125191 5⑈ 0285

0040782932

[redacted] RENEE B. PINCOCK
PHONE 678-2320
250 WEST 200 SOUTH 65-7
BLANDING, UTAH 84511

2535

173

Oct [redacted] 1986 31-1/1240

Pay to the order of Utah GOP $ 10.00

Ten and no/100 Dollars

BLANDING OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
55 SO. MAIN • BLANDING, UTAH 84511

For

Renee B. Pincock

⑈124000012⑈ 036 ⑈027 18⑈ 2535

NAT M. TAGGART 268 S
OR BERNICE A. TAGGART
2980 SOUTH 2700 EAST 485-5970
SALT LAKE CITY, UTAH 84109

5570

Oct 13 1986 97-154/1240

Pay to the order of Utah Republican Party $ 25.00

Twenty Five & no/100 Dollars

OLYMPUS OFFICE
VALLEY BANK
& TRUST COMPANY
2855 EAST 33RD SOUTH, SALT LAKE CITY, UTAH 84109

For

Nat M Taggart

⑆124001545⑆04 ⑈1036⑈ 5570

[redacted]

1588

★ Ephraim H. or Camille Fankhauser
1864 Cottonwood Club Dr. 278-8449
11/71 Salt Lake City, Utah 84117

31-6/1240

Oct 13 1986

Pay to the Order of Utah Republican party $ 50 00

Fifty and no/100 Dollars

ZIONS FIRST NATIONAL BANK
BROADWAY OFFICE 310 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

For Donation

Ephraim H Fankhauser

⑆124000054⑆ 03 33750 8⑈ 1588

ALVA D. OR RUTH B. GREENE
2554 ELIZABETH ST. NO. 3
SALT LAKE CITY, UTAH 84106

4562

Oct 10 1986

92-1/1241

Pay to the order of Utah Republican Party $ 25.00

Twenty five & no/100 Dollars

Idaho first The Bank
IDAHO FIRST NATIONAL BANK
HEAD OFFICE
P O Box 7009
Boise, Idaho 83727

Alva D. Greene

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

0408ZFN10/15/86#120 $195.00 D 1135508#

98-0171 Always obtain an official receipt when making a deposit.

DEPOSIT SLIP FM 651 (0483)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

| | | |

DEPOSIT SLIP FM 531 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 19	CURRENCY	COIN	CHECKS (LIST SEPARATELY)	
10 15 86			1 Hallingstad	1408 00
			2 Ekins	102 00
			3 Barton	20 00
			4	
			5	
			6	
			7	
			8	
			9	
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			11	
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			13	
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			15	
			16	
			17	
			18	
			19	
			20	
			TOTAL FROM OTHER SIDE	
			PLEASE RE-ENTER TOTAL HERE	TOTAL 325 10

TOTAL ITEMS

TOTAL DEPOSIT

RECEIVED BY

904

⑆124000054⑆ 01 13550 8⑈

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

8408ZFN10/15/86#125 $325.10 D 1135508#

98-0171

Always obtain an official receipt when making a deposit.

90 04 07 48 23 5

HOLLINGSHAUS FOR H[redacted] COMMITTEE
2741 ALDEN ST. 484-5453
SALT LAKE CITY, UTAH 84106

Oct 14 19[redacted]86 [redacted]190

31-7069
3240 13

PAY TO THE ORDER OF Utah Republican Party $ 168.00

One Hundred Sixty Eight DOLLARS

WESTERN SAVINGS AND LOAN COMPANY
2282 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84106

5-84

John Hollingshaus

MEMO

⑆324070596⑆321355093518⑈ 0190

[redacted] BANK

Oct. 15 1986

Pay to the Order of Utah Republican Party $107 10/00

One Hundred Seven + 10/00 Dollars

ZIONS FIRST NATIONAL BANK
ROOSEVELT OFFICE 156 NORTH 200 EAST
ROOSEVELT, UTAH 84066

For Beverly Evans

⑆124301436⑆ 27 34889 5⑈

1034

BARTON FOR STATE SENATOR COMMITTEE 482
3940 WEST 4100 SOUTH
WEST VALLEY CITY, UT 84120

10-15 1986 97-154/1240

Pay to the order of Fifty Dollars and no/100 $ 50.00

Fifty + no/100 Dollars

REDWOOD ROAD OFFICE
VALLEY BANK & TRUST COMPANY
3430 SOUTH REDWOOD ROAD, SALT LAKE CITY, UT 84119

Memo Tickets

Orson K. Gardner

⑆124001545⑆03 035999⑈ 1034

C0040078293 0

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FIM 631 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

410

DATE 10 15 86																									
CURRENCY																									
COIN																									
CHECKS (LIST SEPARATELY) 1	17 00																								
2																									
3																									
4																									
5																									
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17																									
18																									
19																									
20																									
TOTAL FROM OTHER SIDE																									
PLEASE RE-ENTER TOTAL HERE	17 00																								

TOTAL ITEMS

TOTAL DEPOSIT

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑆124000054⑆ 01 13550 8⑈

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with
ZIONS
FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

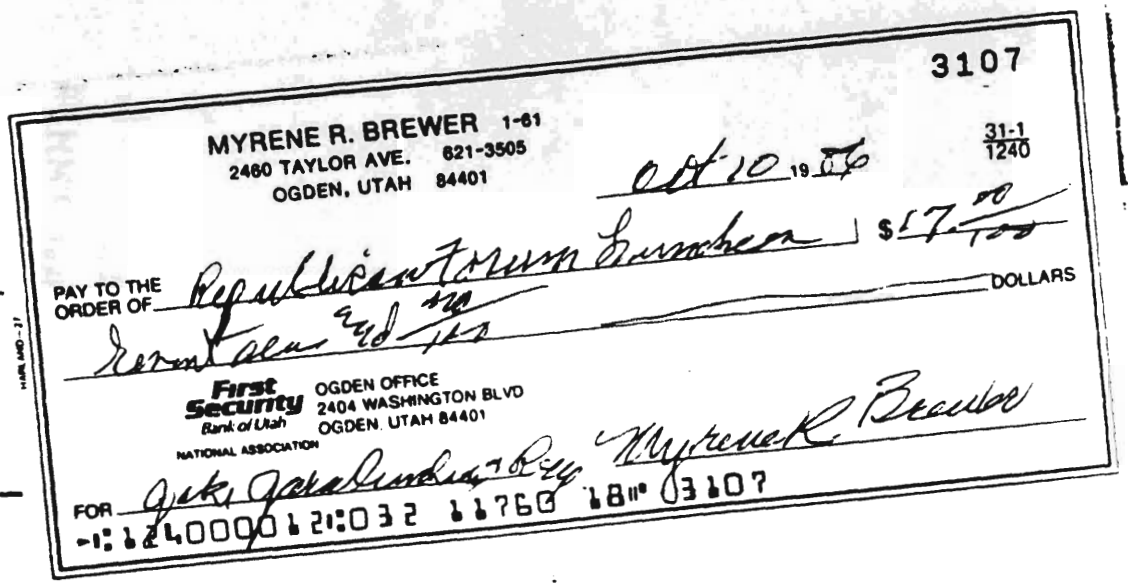
8408ZFN10/15/86#128 $17.00 D 1135508#

99-0171

Always obtain an official receipt when making a deposit

00040737

0 0 0 4 0 7 8 2 9 3 8



3107

MYRENE R. BREWER 1-61
2460 TAYLOR AVE. 621-3505
OGDEN, UTAH 84401

31-1
1240

Oct 10 19 86

PAY TO THE ORDER OF Republican Forum Luncheon $ 17 00/100

Vern Talen 2nd $20

DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
OGDEN OFFICE
2404 WASHINGTON BLVD
OGDEN, UTAH 84401

FOR Yuki Jaralundin Rep Myrene R. Brewer

⑈124000121⑆032 11760 18⑈ 3107

RETIRED?

Ask about
Guaranteed Social Security
Deposit

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

0408ZFN10/15/86#126 $50.00 D 1135508#

99-0171 Always obtain an official receipt when making a deposit.

DEPOSIT SLIP FM 631 (9/83)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

501

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	October 15 19 86			
CURRENCY				
COIN				
CHECKS (LIST SEPARATELY) 1	Bunker	20	06	
2	Peterson	20	00	
3	Knight	10	00	
4				
5				
6				
7				
8				
9				
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16				
17				
18				
19				
20	TOTAL FROM OTHER SIDE			
	ADD ENTER TOTAL HERE	TOTAL		50 00
TOTAL ITEMS		TOTAL DEPOSIT		

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

6 2 6 7 9 7 0 4 6 6 0

CHARLES M. KNIGHTON
ARTELLA J. KNIGHTON
934 HOLLYWOOD AVENUE 466-1934
SALT LAKE CITY, UTAH 84105

983

Oct. 9 1986

31-1/1240

146

Pay to the order of Utah Republican Party $ 10 00

Ten and no/100 Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
MAIN AT FIRST SOUTH OFFICE
79 South Main
Salt Lake City, Utah 84111

For _____ Charles M. Knighton

⑆124000012⑆051 14200 10⑈ 0983

V & M ASSOCIATES
VANCE B. OR MARGERY M. PETERSON
13411 BALLAD DRIVE 584-6277
SUN CITY WEST, AZ 85375

1352

Sept 30 1986

91-170/1221

Pay to the order of Utah Republican Party $ 20 00

Twenty and no/100 Dollars

THE ARIZONA BANK
SUN CITY WEST OFFICE
13802 MEEKER BLVD.
SUN CITY WEST, ARIZONA 85375

For Donation Year 1986 Vance B. Peterson

⑆122101706⑆1352 056⑈039502⑈

GRACE H. BAUGH 1-77
493 SOUTH 1ST WEST PH 752 4641
LOGAN, UTAH 84321

1604

Oct 17 1986

31-1240

PAY TO THE ORDER OF Utah Republican Party $ 5 00

Five and 00/100 DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
LOGAN OFFICE
5 SOUTH MAIN
LOGAN, UTAH 84321

FOR Donation

⑆124000012⑆034 15871 37⑈ 1604

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 631 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

	DATE	CURRENCY	COIN	CHECKS (LIST SEPARATELY)	
1	19				
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20	TOTAL FROM OTHER SIDE				
	TOTAL ITEMS			TOTAL DEPOSIT	

X CASH IN RECEIVED TOTAL HERE TOTAL

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE SUBJECT TO FINAL PAYMENT.

⑈124000054⑈ 01 13550 8⑈

00040782041

ENDORSE ALL ITEMS PROPERLY
LIST SEPARATELY

CHECKS	DOLLARS	CENTS
1 Dawdall Parks	$ 5	50
2 Evans	17	00
3 Eggenson	$ 5	50
4 Schrodyer	$ 5	50
5 Woolsey	$ 5	50
6 Jorden	$ 5	50
7 Pitt. Grays	$ 5	50
8 Ufas Hard Rubber	$ 5	50
9 Burick	37	00
10		
11		
12		
13		
14		
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21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
TOTAL	113	50

ENTER TOTAL ON FRONT OF THIS DEPOSIT SLIP

CASH COUNT	FOR BANK USE ONLY
X 100	
X 50	
X 20	
X 10	
X 5	
X 2	
X 1	
TOTAL	

0 0 0 4 0 7 8 2 0 9 4 2

MERWYN B. ELLIS 1078
ARLENE W. ELLIS
1496 JAMESTOWN DR. 277-6862
SALT LAKE CITY, UT 84121

448

Oct 16 19 86

31-2/1240

Pay to the Order of Utah Republican Party $ 8 50/100

Eight Dollars 50/100 - Dollars

First Interstate Bank
First Interstate Bank of Utah, N.A.
Super House Office
1030 East 2100 South
Salt Lake City, Utah 84108

For

Arlene W. Ellis

⑆124000025⑆ 06 27388 2⑈ 0448

J. M. BROOKS 875
OR JUNICE M. STANLEY
129 F STREET 363-3392
SALT LAKE CITY, UTAH 84103

1153

Oct. 18 19 86

31-4/1240

PAY TO THE ORDER OF Utah Republican Headquarters $ 8 50

Eight 50/100 DOLLARS 50 CENTS

SOUTH TEMPLE OFFICE
CONTINENTAL BANK
708 East South Temple
Salt Lake City, Utah 84102

Junice M. Stanley

⑆124000041⑆ 1153 078503631⑈

RUTH C. PHILLIPS 5-77
PH. 262-2078
885 E. THREE FTNS. DR., UNIT 212
MURRAY, UTAH 84107

115

Oct. 14 19 86

31-1/1240 146

PAY TO THE ORDER OF Utah Republican Headquarters $ 8 50/100

Eight 50/100 DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
MURRAY OFFICE
4740 SOUTH 8TH EAST, MURRAY, UTAH 84117

MEMO Luncheon

Ruth C. Phillips

⑆124000121⑆ 146 10250 15⑈ 0115

DR. or MRS. STANLEY N. CLARK
1075 ELM AVE. PHONE 374-0520
PROVO, UTAH 84604

DATE 10/16/86

CHECK NUMBER 5562

CENTRAL BANK OF PROVO
PROVO, UTAH
97-17/1243

for: Luncheon

Pay Eight and 50/100 DOLLARS $ 8 50/100

TO THE ORDER OF Utah Republican Hdqs.

DR. or MRS. STANLEY N. CLARK

Stanley N. Clark

⑆124⑈0032⑆ 51⑈30394⑈9⑈

CHARLES L. STODDARD 3-83
WILLIAM R. STODDARD
4621 HOLLADAY BLVD. 278-5196
SALT LAKE CITY, UTAH 84117. . .

496

10-16 19 86

31-1/1240 070

PAY TO THE ORDER OF Utah Republican Party $ 17.00

Seventeen Exactly DOLLARS

COTTONWOOD-HOLLADAY OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
4711 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84117

MEMO

Charles L Stoddard

⑆124000121:070 11863 22" 0496

VANCE L. OR DIXIE LEE GRUBB
P. O. BOX 398 784-3321
MANILA, UTAH 84046

1006

10-16 19 86 99-26/1023

Pay to the order of Ut State Republican $ 8 50

Eight and 50/100

North Side State Bank
601 NORTH FRONT
ROCK SPRINGS, WYOMING 82901

For

Dixie Lee Grubb

⑆102300268⑆ 4 7105 5" 70

DENNIS R. OR LINDA L. GRAVES 8-83
1376 GOLDEN CIRCLE DR. 546-6610
FRUIT HEIGHTS, UTAH 84037

2738

Oct 16 19 86 97-74/1243

PAY TO THE ORDER OF UTAH Republican NTQRTERS $ 17.00

Seventeen + 00/100 DOLLARS

BARNES BANKING CO.
KAYSVILLE, UTAH 84037

FOR Republican acct

Dennis R Graves

⑆124300746⑆01 ⑆333337" 2738

412

ROBERT J. OR RANDI DUNN
16 WEST VALLEY DRIVE 266-0314
MURRAY, UT 84107

977 Oct 11 19 86 97-194/1243

Pay to the order of Utah Republican Headquarters $ 8 50

Eight and 50/100 Dollars

UNITED BANK
5595 SOUTH STATE (801) 262 7467
MURRAY, UTAH 84107

For

Robert J Dunn

⑆124301944⑆ 40620 4" 0412

Blaine Walker
4210 Panorama Dr.
Salt Lake City, Utah 84124

3063

Oct. 16 19 86

Pay to the Order of Utah Republican Hdqtrs. $17.00

Seventeen and 00/100 Dollars

ZIONS FIRST NATIONAL BANK
OREM OFFICE P.O. BOX 130
OREM, UTAH 84057

for _____ H. Blaine Walker

⑈124302749⑈ 71 30935 5⑈ 3063

RONALD R. OR GEORGIA B. HARE
P. O. BOX 997 801 743-6802
FILLMORE, UTAH 84631

6862

873

Oct 16 1986 31-1/1240

Pay to the order of Utah Republican Headquarters $ 17.00

Seventeen and no/100 Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
FILLMORE OFFICE
81 South Main
Fillmore, Utah 84631

For _____ Georgia B. Hare

⑆124000121⑆094 11531 16⑈ 6862

Rocky Mountain Bank Note B America West

Mark J. Taylor
Attorney At Law
600 Boston Building 532-7080
08/84 Salt Lake City, Utah 84111

357

31-5/1240

10-16 1986

Pay to the Order of Utah Republican Party $8.50

Eight and 50/100 Dollars

ZIONS FIRST NATIONAL BANK
BROADWAY OFFICE 310 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

For donation Mark J. Taylor

⑈124000054⑈ 03 13435 0⑈ 0357

MICHAEL L. JONES OR JOY JONES
818 SOUTH SHIRLEY RAE DR. 451-5118
FARMINGTON, UTAH 84025

1412

Oct 16 1986

1181

Pay to the order of Utah Republican Party $ 8.59

Eight and 59/100 Dollars

UNITED SAVINGS & LOAN ASSOCIATION
Fourth South Office
376 E. Fourth South • Salt Lake City, UT 84111

For _____ Michael L. Jones

⑆324370513⑆321200005864⑈ 1412

DP-3

ANNE G. WIRTHLIN
2757 ST. MARY'S WAY 581-1969
SALT LAKE CITY, UTAH 84108

1535

Oct 16 19 86 31-257/1240

PAY TO THE ORDER OF Utah Republican $ 8.50

Eight 50/100 DOLLARS

UTAH FIRSTBANK
Downtown Office
Number Two Main Street P.O. Box 9159 Salt Lake City, Utah 84109-9159

FOR

⑆124002573⑆ 30142 9⑈ 1535

PUBLIC AFFAIRS ADVISORY GROUP 485
1358 S. MAIN STREET 484-0165
SALT LAKE CITY, UT 84115

1222

Oct 16 19 86 31-7950/3240

Pay to the order of G.O.P. $ 42 50/100

Forty-two and 50/100 Dollars

UTAH C.V. FEDERAL CREDIT UNION
288 EAST 6TH SOUTH / SALT LAKE CITY, UTAH 84111

For

⑆324079500⑆ 7520 ⑆5573909⑈ 1222

[redacted]

3867

M. Tom or Junko Shimizu
2977 East 7000 South 942-0437
06/71 Salt Lake City, Utah 84121

31-8/1240

10/16, 1984

Pay to the Order of Ut Rep Pty $ 8 50

Eight and 50/100 Dollars

ZIONS FIRST NATIONAL BANK
HEAD OFFICE P.O. BOX 30709
SALT LAKE CITY, UTAH 84130

For

⑆124000054⑆ 02 41981 0⑈ 3867

DORIS H. WILSON
1229 LONGWORTH BLDG.
WASHINGTON, D.C. 20515

133

Oct. 16 19 86 50-947/219

PAY TO THE ORDER OF Utah Republican Party $ 8.50

Eight 50/100 DOLLARS

COMPENSATIONAL FEDERAL CREDIT UNION
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON D.C. 20515
PAYABLE THROUGH CHASE MANHATTAN BANK N.A. MONROE BRANCH MONROE, NY

MEMO

⑆021909478⑆ 71918773313⑈ 0133

OAKLEY S. EVANS
994 OAK HILLS WAY
SALT LAKE CITY, UTAH 84108
[redacted]76

1252

Oct. 16 19 86

31-1/1240

Pay to the order of Utah Republican Party $ 17.00

Seventeen and no/100 Dollars

MAIN AT FIRST SOUTH OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
79 SO. MAIN • SALT LAKE CITY, UTAH 84111

For

Oakley S. Evans

⑆124000121⑆051 18577 40⑈ 1252

SHEARSON LEHMAN BROTHERS
An American Express company

JERRY C HIGGINSON
3005 THACKERY PLACE PH 801 582 2101
SALT LAKE CITY, UT 84108

1457

938

10/16 19 86

3-5/310

Pay to the Order of Utah GOP $ 8.50

eight & 50/100 Dollars

FINANCIAL MANAGEMENT ACCOUNT
PROVIDENT NATIONAL BANK
17TH & CHESTNUT STREETS PHILA PA

T D [3] For

⑆031000053⑆ 6200169938⑈ 1457

ROBERT G. SCHILDMEYER 5-80
SUSAN R. SCHILDMEYER
9553 SOUTH 1335 EAST 571-9450
SANDY, UTAH 84070

224

15 Oct 19 86 31-7800/3240

PAY TO THE ORDER OF Utah Republican Party $ 8.50

Eight dollars 50 cents DOLLARS

LDS CHURCH EMPLOYEES CREDIT UNION
147 NORTH 200 WEST • P.O. BOX 4000 • SALT LAKE CITY, UTAH 84110

MEMO

Susan Schildmeyer

⑆324078909⑆7380 0010532⑈ 0224

1948

JUNE WOOLLEY 866 V
2931 WHITE CIRCLE 485-2570
SALT LAKE CITY, UT 84109

Oct 16 1986

31-2/1240

Pay to the Order of Utah Republican Party $ 8.50

Eight & 50/100 Dollars

First Interstate Bank
First Interstate Bank of Utah, N.A.
Main Office
180 South Main Street
Salt Lake City, Utah 84101

For

June Woolley

⑆124000025⑆ 02 18588 2⑈ 1948

Republican Forum Luncheon [redacted] cost

MAIN AT FIRST SOUTH OFFICE
FIRST SECURITY BANK OF UTAH
National Association
SALT LAKE CITY [redacted] 84111
31-1/[redacted]

No. 1385

DATE October 13 19 86

Pay Eight and ----------50/100 Dollars $ 8.50

TO THE ORDER OF UTAH REPUBLICAN HEADQUARTERS

WESTERN STATES MANAGEMENT CORP.
2159 SOUTH 700 EAST, SUITE 200 467-3600
SALT LAKE CITY, UTAH 84106

1285

By Scott W. Thurston

⑈001385⑈ ⑆124000012⑆051 02599 14⑈

SP3000 FC SECURITY PRINTERS, INC.

THE DEVELOPMENT SOURCE
445 EAST 200 SOUTH 350-7456
SALT LAKE CITY, UTAH 84111

1416

885

31-1/1240

Pay to the order of Republican Party Oct 16 1986 $ 8.50

Eight & 50/100 Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
FOOTHILL OFFICE
2301 East 1300 South
Salt Lake City, Utah 84108

For

Carolyn K. Bailey

⑈001416⑈ ⑆124000012⑆066 10431 74⑈

UTAH ASSOCIATION OF REALTORS®
1935 South Main Street Suite #211 487-8983
Salt Lake City, Utah 84115

REALTOR®

007406

South Salt Lake Office
VALLEY BANK & TRUST CO
2510 South State Street
Salt Lake City, Utah 84115
97-154 1240

PAY EIGHT DOLLARS AND 50/100----------

DATE	PAY THIS AMOUNT
10/16/86	8.50

THE ORDER OF

UTAH REPUBLICAN PARTY

H. Blaine Hatch

⑈007406⑈ ⑆124001545⑆01 05914 9⑈

[redacted]

wick Construction Company

SOUTH 3270 WEST | SALT LAKE CITY, UTAH 84119
EAST | CONTRACTORS

SUGAR HOUSE OFFICE
ZIONS FIRST NATIONAL BANK
SALT LAKE CITY, UTAH
249

61234
CHECK NUMBER

CHECK DATE
10-16-86

Utah Republican Party

PAY THIS AMOUNT
$**1,200.00**

⑈61234⑈ ⑆124000054⑆ 1 2 9 3 0 ⑈

DEPOSIT SLIP FM-631 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

DATE 19 86

CURRENCY 10 00

COIN 15 00

CHECKS 10 00

TOTAL ITEMS 20

TOTAL FROM OTHER SIDE 42

TOTAL 4 20

TOTAL DEPOSIT 8

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL FINALLY PAID.

⑆124000054⑆ 01 [illegible] ⑈

0 5 0 7 8 7 0 4 0 0 0 0

BLAIR OR BIRGITTA WOOD
3651 SOUTH 3600 WEST
WEST VALLEY CITY, UTAH 84119

Oct 15, 1986 31-7053/3240

PAY TO THE ORDER OF Utah GOP $10.00

Ten and no/100 DOLLARS

American Savings
WEST VALLEY
2727 West 3500 South West Valley, Utah 84119

FOR Blair Wood

⑈324070538⑈0808 01028539 5⑈

2054

NED A. OR MARVA P. PACKER 6-79
4480 SOUTH 4560 WEST 966-3144
WEST VALLEY CITY, UTAH 84120

Oct 13 1986 31-7918/3240

PAY TO THE ORDER OF Utah GOP $ 5.00

Five DOLLARS

SALT LAKE CITY EMPLOYEES' CREDIT UNION
1380 SOUTH MAIN
SALT LAKE CITY, UTAH 84115

MEMO Ned A Packer

⑆324079186⑆0000000 160194⑈ 2054

ZIONS FIRST NATIONAL BANK 497

★Rita Benson
3169 Dorie Street 486-8005
08/82 Salt Lake City, Utah 84106

10/20 86

Pay to the Order of Utah G.O.P. $15.00

Fifteen 00/100 Dollars

ZIONS FIRST NATIONAL BANK
HEAD OFFICE P.O. BOX 30709
SALT LAKE CITY, UTAH 84130

For Donation Rita Benson

⑆124000054⑆ 02 53443 6⑈ 0497

Alice Welti Buehner
RFD 1 Box 322 654-3327
Heber City, Utah 84032
4179 S. 650 E. 265-1757
11/74 Salt Lake City, Utah 84107

2435

31-6/1240

Oct 17, 1986

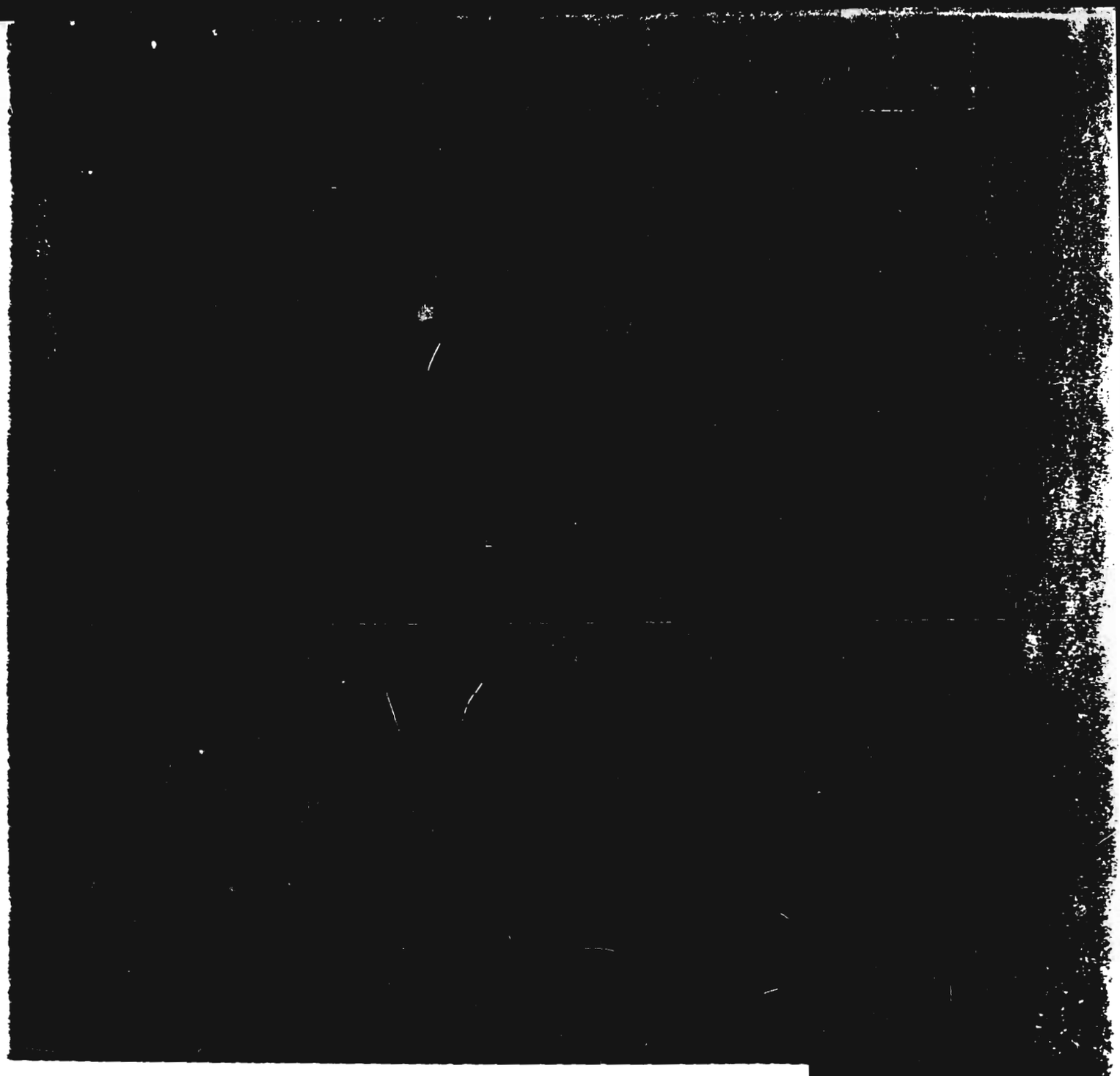
Pay to the Order of Utah Republican Party $ 10.00

Ten & no/100 Dollars

ZIONS FIRST NATIONAL BANK
HEBER VALLEY OFFICE P.O. BOX 248
HEBER CITY, UTAH 84032

For Alice Buehner

⑆124000054⑆ 29 30961 4⑈ 2435



925

JAN ANDERSON 9-82
455 NORTH 1400 WEST 364-9387
SALT LAKE CITY, UTAH 84116

10-18 19 86 31-7690 3240

PAY TO THE ORDER OF Utah Republican Party $ 2.00

two & no/100 DOLLARS

LDS CHURCH EMPLOYEES CREDIT UNION

MEMO for capitol photo Jan Anderson

⑆324078909⑆7380 00244370⑈ 0925

DEPOSIT SLIP RM 831 (0403)

ZIONS
FIRST NATIONAL BANK
103 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL FINAL PAYMENT IS MADE.

604
ICPBT 19 86

DATE		
CURRENCY		85 50
COIN		93 00
CHECKS (LIST SEPARATELY)	1	66 60
	2	136 10
	3	36 00
	4	71 07
	5	1,365 34
	6	54 60
	7	
	8	
	9	
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	17	
	18	
	19	
	20	
TOTAL FROM OTHER SIDE		
PLEASE TOTAL ITEMS	TOTAL	3661 20
TOTAL ITEMS	TOTAL DEPOSIT	3,661 20

RECEIVED BY

:124000054: 01 13560 8m

0 0 1 4 0 7 8 2 9 5 5

HOLLINGSHAUS FOR HOUSE COMMITTEE
2741 ALDEN ST. 484-8453
SALT LAKE CITY, UTAH 84106

193

Oct 21 19 86

31-7059/1240

PAY TO THE ORDER OF Utah Republican Party $ 85.00

Eighty five & no/100 DOLLARS

WESTERN SAVINGS AND LOAN COMPANY
2262 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84106

MEMO Meeting

John Hollingshaus

5-84

⑆324070596⑆ 321355093518⑈ 0193

HOLLINGSHAUS FOR HOUSE COMMITTEE
2741 ALDEN ST. 484-8453
SALT LAKE CITY, UTAH 84106

192

Oct 20 19 86

31-7059/1240

PAY TO THE ORDER OF Utah Republican Party $ 95.00

Ninety five & no/100 DOLLARS

WESTERN SAVINGS AND LOAN COMPANY
2262 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84106

MEMO 1338

John Hollingshaus

5-84

⑆324070596⑆ 321355093518⑈ 0192

COOK

1178

COOK SLURRY COMPANY
COOK ASSOCIATES INC.
2026 BENEFICIAL LIFE TOWER 533-0299
SALT LAKE CITY, UTAH 84111

11462

ZIONS FIRST NATIONAL BANK
Head Office
One South Main Street
Salt Lake City, Utah 84111

31-5/1240
35817-36T

PAY Six Hundred Eighty Six and 27/100 Dollars----------

DATE October 17, 1986

AMOUNT $ 686.27

TO THE ORDER OF Republican Party of Utah

Melvin R. Cook

⑈011462⑈ ⑆124000054⑆ 02 15626 3⑈

4

COOK

1178

COOK SLURRY COMPANY
C[redacted]SOCIATES INC.
2026 BENE[redacted]L LIFE TOWER 533-0299
SALT LAKE CITY, UTAH 84111

11461

ZIONS FIRST NATIONAL BANK
Head Office
One South Main Street
Salt Lake City, Utah 84111
31-5/1240
35817-36T

PAY One Thousand, Two Hundred Sixty Two and 10/100 Dollars------

DATE October 17, 1986

AMOUNT $ 1,262.10

TO THE ORDER OF Republican Party of Utah

[redacted]

⑈011461⑈ ⑆124000054⑆ 02 15626 3⑈

Rocky Mountain Bank Note

NEIGHBORS FOR MERRILL
4280 SOUTH 838 EAST 266-4981
SALT LAKE CITY, UTAH 84107

684

130

31-248/1240

Pay to the order of Utah Republican Party $ [redacted]

Dollars

UNION BANK
PARKVIEW BRANCH
1153 EAST 3900 SOUTH
SALT LAKE CITY, UTAH 84117

For [redacted]

⑆124002489⑆ 21 100114 0⑈ 0130

Bob Sykes Campaign
430 Wall Street 531-7730
Salt Lake City, Utah 84103

428

31-S/1240

10-31 19 86

$ 71.24

DOLLARS

ZIONS FIRST NATIONAL BANK
FIRST SOUTH OFFICE / SALT LAKE CITY 84101

1001

⑆124000054⑆ 01 42008 2⑈ 0428

RICHARD J. CARLING - TRUST ACCOUNT
ATTORNEY AT LAW
1000 CONTINENTAL BANK BLDG.
SALT LAKE CITY, UTAH 84101

769

№ 20241

THE CONTINENTAL BANK & TRUST CO.
P O BOX 30177
SALT LAKE CITY, UTAH 84125
31-4/1240

PAY One Thousand Three Hundred sixty-nine and 39/100 — DATE Oct 17, 1986 — AMOUNT $1369.39

TO THE ORDER OF Republican Party of Utah

RICHARD J. CARLING - TRUST ACCOUNT

⑈002024⑈ ⑆124000041⑆ 0222619⑈

LC SECURITY PRINTERS INC.

11463

COOK

1178

COOK SLURRY COMPANY
COOK ASSOCIATES INC.
2026 BENEFICIAL LIFE TOWER 533-0299
SALT LAKE CITY, UTAH 84111

ZIONS FIRST NATIONAL BANK
Head Office
One South Main Street
Salt Lake City, Utah 84111
31-5/1240
35817-36T

PAY Fifty Four and 67/100 Dollars---------- DATE October 20, 1986 AMOUNT $ 54.67

TO THE ORDER OF Republican Party of Utah

⑈011463⑈ ⑆124000054⑆ 02 15626 3⑈

Rocky Mountain Bank Note

DEPOSIT SLIP RM 631 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	10/21/86
CURRENCY	
COIN	
CHECKS LISTED BELOW	50 00
	100 00
7	
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16	
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TOTAL FROM OTHER SIDE	
TOTAL ITEMS	
TOTAL DEPOSIT	150 00
CLERK ENTER TOTAL HERE / TOTAL	150 00

RECEIVED BY

⑆124000054⑆ 01 [illegible] 60 8⑈

⑈0040782057⑈

DR. or MRS. STANLEY N. CLARK
1075 ELM AVE. PHONE 374-0520
PROVO, UTAH 84604

DATE 10/16/86

CHECK NUMBER 5561

CENTRAL BANK OF PROVO
PROVO, UTAH
97-17/1243

for: Dues

Pay Fifty and No/100 DOLLARS $50.00

TO THE ORDER OF Provo Republican Club

DR. or MRS. STANLEY N. CLARK

Mrs. Stanley N. Clark

⑈1243⑈0032⑆ 51⑈30394⑈9⑈

RICHARD J. CARLING - TRUST ACCOUNT
ATTORNEY AT LAW
1000 CONTINENTAL BANK BLDG.
SALT LAKE CITY, UTAH 84101

No 19925

769

THE CONTINENTAL BANK & TRUST CO.
P O BOX 30177
SALT LAKE CITY, UTAH 84125
31-4/1240

PAY One Hundred and no/100

DATE Oct 17, 1986

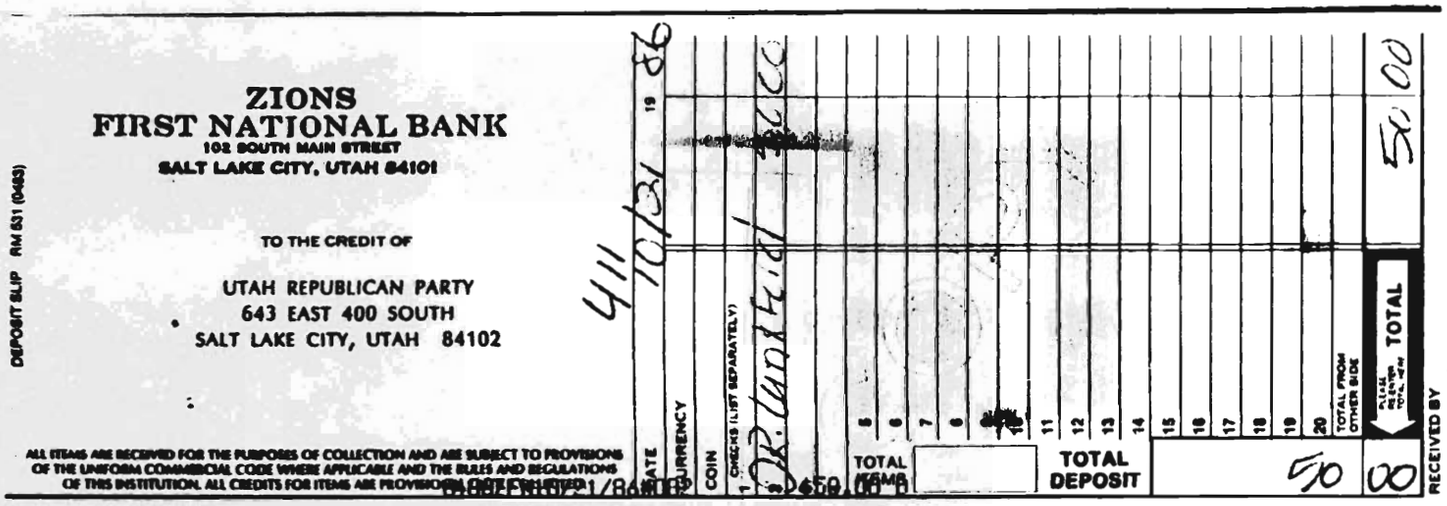
AMOUNT $100.00

TO THE ORDER OF Utah Key Republican Club

RICHARD J. CARLING - TRUST ACCOUNT

⑈0019925⑈ ⑆124000041⑆ 0222616⑈

I C SECURITY PRINTERS, INC.



ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FM 631 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

411 10/31 19 86

CURRENCY 1,000
COIN
CHECKS (LIST SEPARATELY) 1 OR Unitarian 50 00
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20
TOTAL FROM OTHER SIDE
TOTAL

TOTAL ITEMS 1
TOTAL DEPOSIT 50 00

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL FINALLY PAID.

⑆124000054⑆ 01 13550 8⑈

⑈004078259⑈

BEHAVIORAL THERAPY ASSOCIATES
D. R. LANKFORD
2230 N. UNIVERSITY PARKWAY 375-2230
09/83 PROVO, UTAH 84604

97-141/1243

2288

10/16 19 86

PAY TO THE ORDER OF Utah Republican Party $ 50.00 XX

Fifty and 00/100 DOLLARS

ZIONS FIRST NATIONAL BANK
PAYSON OFFICE P.O. BOX 365
PAYSON, UTAH 84651

FOR _____

D. R. Lankford

⑈002288⑈ ⑆124301410⑆ 30 00446 9⑈

DEPOSIT SLIP FM 551 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

CURRENCY	545
COIN	10 [illegible] 86
CHECKS (LIST SEPARATELY)	52 [illegible] 53 00
	100 00
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TOTAL FROM OTHER SIDE	
PLEASE RE-ENTER TOTAL HERE	TOTAL 152 00
TOTAL ITEMS	
TOTAL DEPOSIT	152 00

RECEIVED BY

⑈124000054⑈ 01 13550 8⑈

⑆ 0 0 4 0 7 8 2 0 6 ⑆

CARLOS N. MADSEN, M.D. 1-58
1445 EAST 33RD SOUTH 486-7291
SALT LAKE CITY, UTAH 84106

547

Oct 18 19 86

31-1
1240 55

PAY TO THE ORDER OF Utah Republican Party $ 100 00

One hundred and no DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
HIGHLAND DRIVE OFFICE
3365 HIGHLAND DRIVE, SALT LAKE CITY, UT 84106

MEMO

Carlos N Madsen

⑈124000121⑈055 11108 20⑈ 0547

JACK B. REYNOLDS 384
OR CHERRI G. REYNOLDS
510 N. EMERY AVENUE 226-1848
OREM, UT 84057

1737

10/18 19 86

31-7054/3240

Pay to the order of Utah Republican Party $ 52.00

Fifty Two and no/100's Dollars

OREM OFFICE
DESERET FEDERAL
Savings and Loan Association
1170 South State Street • Orem, Utah 84057

For

Jack B. Reynolds

⑆324070541⑆ 03 44029920⑈ 1737

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT TICKET (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

906
10-21 19 82

CASH	CURRENCY	
	COIN	
1 CHECKS, DRAFTS AND OTHER ITEMS		250 00
2		72 00
3		62 00
4		62 00
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TOTAL FROM OTHER SIDE		
PLEASE RE-ENTER TOTAL HERE	TOTAL	444 00
TOTAL ITEMS	TOTAL DEPOSIT	440 00

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL ACTUALLY PAID.

:124000054: 01 13550 8"

0004078296 3

UTAH EDUCATION [redacted]SSOCIATION
POLITICAL ACTION [redacted]MITTEE
875 EAST 5180 SOUTH (801) 266-4461
MURRAY, UTAH 84107

874

[redacted] № 2623

UNITED BANK
MURRAY, UTAH 84107
97-194/1243

EXACTLY $250.00 CTS
R7854

PAY _____ DATE | AMOUNT

TO THE ORDER OF: Utah Republican Party
643 East 4th South, Suite 2B
Salt Lake City, Utah 84102

October 16, 1986 | $**250.00

[redacted]

⑈000 2623⑈ ⑆124301944⑆ 11 80034 9⑈

SPIRIT SECURITY PRINTERS INC

CATHY ARENTZ
1800 ORCHARD DRIVE
SALT LAKE CITY, UTAH 84106

677

2517

Oct. 20 1986

31-2/1240

Pay to the Order of Utah Republican Party $ 70.00

Seventy Dollars and 00/100 Dollars

First Interstate Bank
First Interstate Bank of Utah, N.A.
Highland Drive Office
3776 Highland Drive
Salt Lake City, Utah 84106

For Avery Labels Cathy Arentz

⑆124000025⑆ 26 14263 8⑈ 2517

BOYD L. WARNICK
HELEN V. WARNICK
4520 MORRIS ST. 968-8866
SALT LAKE CITY, UTAH 84119

1079

782

Oct 20 1986

31-68/1240

Pay to the Order of Utah Republican Party $ 62.00

Sixty-two and 00/100 Dollars

First Interstate Bank
First Interstate Bank of Utah
Pioneer Office
719 South 200 West
Salt Lake City, Utah 84101

For Labels Boyd L. Warnick

⑆124000655⑆ 04 18179 8⑈ 0782

Rocky Mountain Bank Note Co Registry

KEN L. HEATON 986
(CAMPAIGN ACCOUNT)
4592 DRIFTWOOD AVE. 266-2517
SALT LAKE CITY, UT 84123

104

20 Oct. 1986

Pay to the order of State Republican Party $ 62.00

Sixty-Two and 00/100 Dollars

REDWOOD ROAD OFFICE
CONTINENTAL BANK
4136 So. Redwood Road
Salt Lake City, Utah 84123

For envelope labels

Iris Heaton

⑆124000041⑆104 14740?851"

Rocky Mountain Bank Note 8

DEPOSIT SLIP RM 631 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

401 10/31 19 82

DATE			
CURRENCY			
COIN			
CHECKS (LIST SEPARATELY)	Arnold	75 00	
	Walker	25 00	
	Leland	50 00	
	Smith	25 00	
	Equitable	50 00	
	Equitable	50 00	
	Equitable	50

BECHO INCORPORATED
54 North 700 West / North Salt Lake, Utah 84054
(801) 266-8336

FIRST INTERSTATE BANK OF UTAH, N.A.
Main Office
180 South Main Street
Salt Lake City, Utah 84101
31-2/1240

002913

CHECK NO.	DATE	AMOUNT
2913	10-16-86	**20.00**

PAY THE SUM 20 DOLS 00 CTS

TO THE ORDER OF
Utah Governors Club
643 East 400 South
Salt Lake City, Utah 84102

Ruth Lewis

⑈002913⑈ ⑆124000025⑆ 02 04447 7⑈

Lou Lucido

THE PACKAGER, INC.
739 WALL AVENUE
OGDEN, UTAH 84404

COMMERCIAL SECURITY BANK
2491 WASHINGTON BLVD. • OGDEN UTAH 84401

97-1
1243

1218

[redacted] OR LINDA LEFTWICH
[redacted] LANE 225-3735
[redacted] 84601

DATE 10/17/86 AMOUNT 001218 $*****250.00

PAY TO THE ORDER OF
GOVERNOR'S CLUB
643 E. 4TH SOUTH
SALT LAKE CITY, UT 84102

THE PACKAGER, INC.

David C. Dunn Trom
AUTHORIZED SIGNATURE

⑈001218⑈ ⑆124300013⑆ 00006814 8⑈

David Helmstrom

ROBERT C. ARNOLD
TRUSTEE RCA TRUST
1728 EAST 6525 SOUTH
SALT LAKE CITY, UTAH 84121

1076

Oct. 17 19 86

1282

31-4/1240

Pay to the order of Utah Governors Club $ 20.00

Twenty and 00/100 Dollars

The Continental Bank & Trust Co.
MAIN OFFICE
200 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

For Robert C. Arnold Trustee

⑆124000054⑆ 1076 021230B⑈

WARREN E. OR LETA C. PUGH
SPECIAL ACCOUNT
5124 COTTONWOOD LANE 277-2182
SALT LAKE CITY, UTAH 84117

1131

Oct 16 19 86

31-1/1240

Pay to the order of Utah Republican Party $ 500.00

Five Hundred & no/100 Dollars

MAIN AT FIRST SOUTH OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
79 SO. MAIN • SALT LAKE CITY, UTAH 84111

For Governors Club

Warren E Pugh

⑆124000012⑆051 15655 17⑈ 1131

JACK F. OR LINDA LEFTWICH
851 E. OSMOND LANE
PROVO, UTAH 84601

882

Oct. 16 19 86

97-88/1243

PAY TO THE ORDER OF Utah Governors Club $ 20.00

Twenty and no/100 DOLLARS

Deseret Bank
OREM OFFICE
140 WEST 800 NORTH
OREM, UTAH 84057

MEMO

Jack Leftwich

⑈124300880⑈ 9 50397 0006

4158

RANDALL A. MACKEY 1279
OR MARGARET W. MACKEY
1474 HARVARD AVENUE
SALT LAKE CITY, UT 84105

Oct 16 19 86

31-4/1240

Pay to the order of Utah Republican Party $ 8.50

Eight & 50/100 Dollars

CONTINENTAL BANK
MAIN OFFICE
SALT LAKE CITY, UTAH 84101

For

⑆124000041⑆158 02229931

DAVID K. RICHARDS & CO.
303 NORTH 2370 WEST SUITE 200 - 539-0095
08/80 SALT LAKE CITY, UTAH 84116

ZIONS FIRST NATIONAL BANK
Head Office
P.O. Box 30709
Salt Lake City, Utah 84130

6414

10-10 1986 31-5/1240

PAY THE SUM 200 00/100 CTS DOLLARS $ **200.00**

TO THE ORDER OF
Utah Governor's Club
643 East 400 South
Salt Lake City, Ut. 84102

David K. Richards

⑈006414⑈ ⑆124000054⑆ 02 16532 2⑈

Merrill Lynch
Ready Assets Trust

NO 181

THE BANK OF NEW YORK, WHITE PLAINS, NEW YORK

DATE Oct. 16 1986

PAY TO THE ORDER OF Utah Governor's Club

Eight hundred and 00/100

DOLLARS $ 800 00

DEAN F HAMMOND
4089 TAYLOR AVE
OGDEN UT 84403

$500
42419443

Dean F Hammond

⑈424194439⑈ ⑆021902352⑆ 99⑈000009⑈ 0181

GRANITE MILL
QUALITY WOODWORK SINCE 1907
1055 WEST NORTH TEMPLE • SALT LAKE CITY, UTAH

ZIONS
FIRST NATIONAL BANK
Salt Lake City Utah

9083

DATE 10-8-86

PAY Five Hundred Dollars & 00/100---------- $ 500.00

TO THE ORDER OF
Utah Governors Club
Republican Headquarters
643 East 400 So.
Salt Lake City, UT 84102

M. Doug Bradley

Maryanne Livingwalk

⑈009083⑈ ⑆124000054⑆ 02 18303 6⑈

NRS ASSOCIATES INC.
72 EAST 4th SOUTH NO. 345
SALT LAKE CITY, UTAH 84111
270

FASHION PLACE OFFICE
VALLEY BANK
AND TRUST COMPANY
6255 SOUTH STATE SALT LAKE CITY, UT. 84107

97-154/1240 **№** 5561

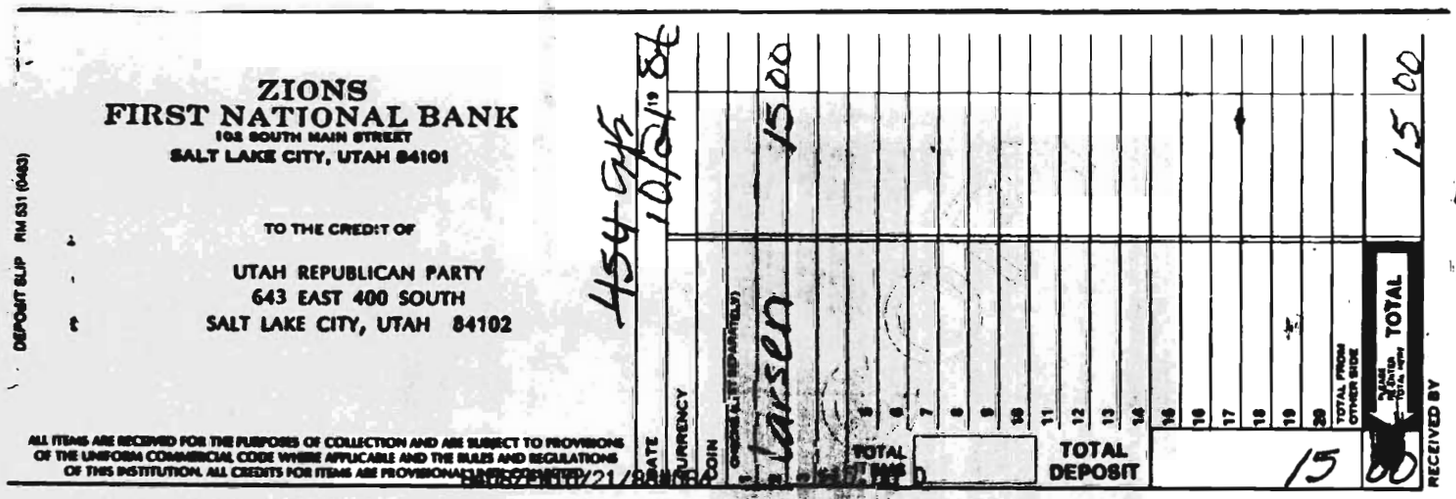
DATE	CHECK NO	AMOUNT
10-14-86		$20.00

PAY Twenty and 00/100 dollars**********

TO THE ORDER OF Utah Governors Club

W R Plagmeier

⑈005561⑈ ⑆124001545⑆05 016290⑈



ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

454 Gyle
10/5/84
15 00
Larsen

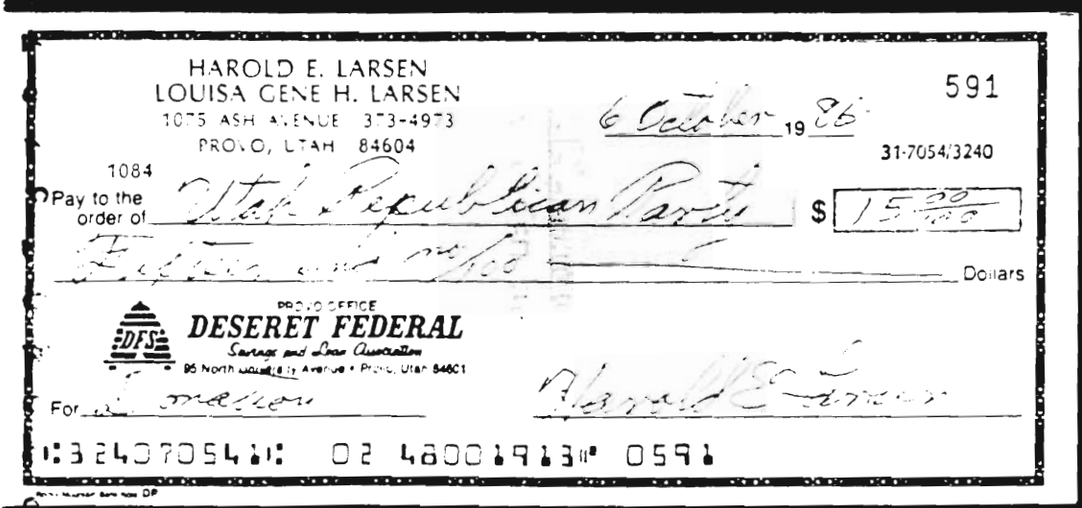
CURRENCY
COIN
CHECKS (LIST SEPARATELY)
TOTAL
TOTAL FROM OTHER SIDE
TOTAL
TOTAL DEPOSIT
15 00
15 00

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL RECEIVED/21/

RECEIVED BY

⑈124000054⑈ 01 13550 8⑈

0 0 4 0 7 8 2 9 7 1



HAROLD E. LARSEN
LOUISA GENE H. LARSEN
1075 ASH AVENUE 373-4973
PROVO, UTAH 84604

591

6 October 19 86

31-7054/3240

1084

Pay to the order of Utah Republican Party $ 15.00

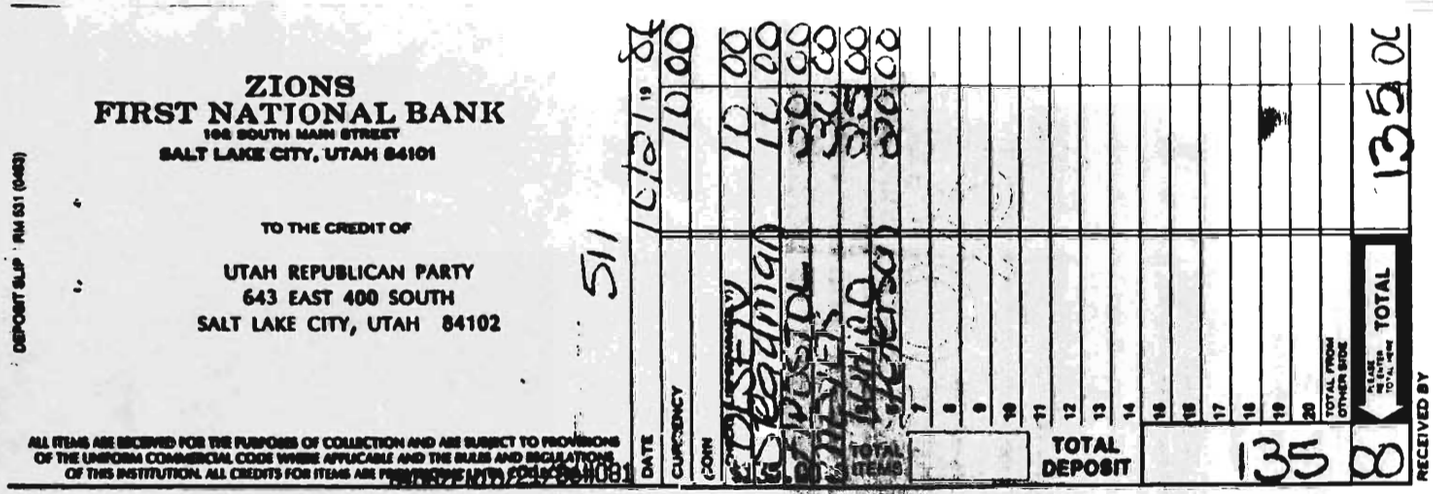
Fifteen and no/100 Dollars

PROVO OFFICE
DESERET FEDERAL
Savings and Loan Association
85 North University Avenue • Provo, Utah 84601

For Election

Harold E. Larsen

⑆324070541⑆ 02 4800191 3⑈ 0591



ZIONS
FIRST NATIONAL BANK
100 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

511

DATE 10/31/84

CURRENCY 10 00

COIN

CHECKS
Pegram 10 00
Peterson 15 00
Peterson 30 00
Peterson 35 00
Peterson 30 00

TOTAL ITEMS 5

TOTAL DEPOSIT 135

TOTAL FROM OTHER SIDE

PLEASE RE-ENTER TOTAL HERE TOTAL 135 00

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL FINAL COLLECTION.

⑈124000054⑈ 01 13550 8⑈

00040787973

GEORGE APOSTOL
JENIEL B. APOSTOL
601 COOLIDGE ST. 561-1195
MIDVALE, UTAH 84047

2237

1171

31-1/1240

Oct 15 19 86

Pay to the order of Utah GOP $30.00

Thirty Dollars & 00/100's Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
WEST JORDAN OFFICE
7869 South Redwood RD.
West Jordan, Utah 84084

For [signature]

⑈002237⑈ ⑆124000012⑆069 11068 35⑈

CURTIS OR CHERYL STEADMAN 378

138

5237 BEGONIA PLACE 969-7610
WEST JORDAN, UT 84084

Oct 16 1986

97-105/1243

Pay to the order of Ut GOP $ 10.00

Ten & no/100 Dollars

D.B.&T. DRAPER Bank & TRUST
208 EAST 12300 SOUTH PH. 571-2141
P.O. BOX 969 DRAPER, UTAH 84020

For [signature]

⑆124301054⑆81 44287 3⑈ 138

LYNN OR JANELL OLSEN

2708

BOX 549 528-3831
GUNNISON, UTAH 84634

10-15 1986

97-69/1243

1180

Pay to the order of Utah GOP $ 10.00

Ten & no/100 Dollars

Gunnison Valley Bank
10 SOUTH MAIN
GUNNISON, UTAH 84634

Life is a miracle filled with wonder and surprises

For donation-Republican Janell Olsen

⑆124300699⑆ 00 021456 9⑈

WESLEY N. OR RUBY O. PETERSON
2566 ELIZABETH ST. NO. 5 467-9176
SALT LAKE CITY, UTAH 84106

1274

1066

10-15 1986

31-89/1240

Pay to the order of Utah Republican Party $ 20.00

Twenty 00/100 Dollars

CSB Commercial Security Bank
SALT LAKE CITY, UTAH 84110

For

Wesley N. Peterson

⑈124000892⑈ 1066 5201578599⑈

ZIONS FIRST NATIONAL BANK

WHICO
3072 NORTH 175 WEST
09/85 OGDEN, UTAH 84404

1526

97-140/1243

OCTOBER 12 1986

Pay to the Order of UTAH REPUBLICAN PARTY $ 25.00

TWENTY FIVE AND no/100 ********** Dollars

ZIONS FIRST NATIONAL BANK
OGDEN OFFICE P.O. BOX 1311
OGDEN, UTAH 84402

For

Carolyn R. Pitts

⑈001526⑈ ⑆124301407⑆ 46 01860 2⑈

★ THE FLAMINGO ACADEMY OF FINE ARTS
JOHANN G. MEYER OR RAE MEYER
P. O. BOX 13
MILFORD, UTAH 84751
387-2607

1989

15 Oct 1986

31-2/1240

881

Pay to the order of Utah GOP $ 30 00/100

Thirty 00/100 Dollars

First Interstate Bank

First Interstate Bank of Utah
Milford Office
326 South Main Street
Milford, Utah 84751

For Rep. Party

Johann G. Meyer

⑈124000025⑈ 57 11241 9⑈ 1989

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 851 (0488)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	19 88
CURRENCY	2000 00
COIN	500 00
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TOTAL FROM OTHER SIDE	
PLEASE RETAIN THIS TOTAL	2500 00
TOTAL ITEMS	
TOTAL DEPOSIT	2500 00

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

9 7 6 2 9 2 0 4 0 0 0 0

DEPOSIT SLIP RM 831 (0483)

ZIONS
FIRST NATIONAL BANK
103 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

DATE 6/4/86
CURRENCY
COIN
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

1	Lattimer	132 71
2	Sargeant	246 60
3	Clifton	346 65
4	Christensen	151 66
5	Hansen	1554 44
6	Mace	514 62
7	Corbett	345 62
8	Watkins	913 64
9	Stucki	11,119 88
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20	TOTAL FROM OTHER SIDE	
	TOTAL	14395 17

TOTAL DEPOSIT 14395 17

RECEIVED BY

⑈124000054⑈ 01 13550 8⑈

900407 0977

COOK

1178

COOK SLURRY COMPANY
COOK ASSOCIATES INC.
2026 BENEFICIAL LIFE TOWER 533-0299
SALT LAKE CITY, UTAH 84111

11467

ZIONS FIRST NATIONAL BANK
Head Office
One South Main Street
Salt Lake City, Utah 84111

31-5/1240
35817-367

PAY Eleven Thousand, One Hundred Nineteen and 88/100 Dollars-----

DATE: October 24, 1986

AMOUNT: $ 11,119.88

TO THE ORDER OF: Republican Party of Utah

Melvin R. Cook

⑈011467⑈ ⑆124000054⑆ 02 15626 3⑈

1013

LOWELL PETERSON CAMPAIGN COMMITTEE 880

Oct 23 [illegible] 97-1/1243

Utah Republican Party

$ 912.00

NINE HUNDRED TWELVE AND No/100 Dollars

NEWGATE OFFICE
CSB Commercial Security Bank
3775 WALL AVENUE
SOUTH OGDEN, UTAH 84405

Lowell P. Peterson

BRYSON OR JAN GARBETT
4850 HELLAS DR. 966-4850
SALT LAKE CITY, UTAH 84120
1280

650

OCT 24 19 86 31-257/1240

Pay to the order of UTAH REPUBLICAN PARTY $ 345.00

THREE HUNDRED FORTY-FIVE and no/100 Dollars

CITIBANK (UTAH)
P.O. BOX 520007 • SALT LAKE CITY, UTAH 84152

For _____ Bryson Garbett

⑆124000257③⑆ 31054 7⑈ 0650

Rocky Mountain Bank Note ®

Bob Sykes Campaign
430 Wall Street 531-7730
Salt Lake City, Utah 84103

31-5/1240

427

10-24 19 86

PAY TO THE ORDER OF Utah Republican Party $ 514.00

five hundred and fourteen & 00/100 DOLLARS

ZIONS FIRST NATIONAL BANK
FIRST SOUTH OFFICE / SALT LAKE CITY 84101

FOR Mailing - Postal Robert B Sykes

⑆124000054⑆ 01 4 2008 2⑈ 0427

126

AFTON BRADSHAW CAMPAIGN
1931 BROWNING AVENUE 581-9646
SALT LAKE CITY, UT 84108

Oct 24 1986 31-7056/3240

Pay to the Order of Utah Republican Party $ 454.40

Four hundred fifty four & 40/100 Dollars

home SAVINGS AND LOAN
HOME OFFICE
130 EAST 3300 SOUTH 486-8808
SALT LAKE CITY, UTAH 84115

READY ACCESS MONEY MARKET ACCOUNT

For Mailing brochures Afton Bradshaw

⑆324070567①⑆3302 30040919⑈ 0126

Rocky Mountain Bank Note ®

200

HOLLINGSHAUS FOR HOUSE COMMITTEE
2741 ALDEN ST. 484-8453
SALT LAKE CITY, UTAH 84106

Oct 24 1986 31-7059/3240 13

PAY TO THE ORDER OF Utah Republican Party $ 131.63

One Hundred Thirty One & 63/100 DOLLARS

WESTERN SAVINGS AND LOAN COMPANY
2263 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84106

5-84

John Hollingshaus

KEN L. HEATON 986
(CAMPAIGN ACCOUNT)
4592 DRIFTWOOD AVE. 266-2517
SALT LAKE CITY, UT 84123

109

22 Oct. 1986

31-4/1240

Pay to the order of Utah State Republican Party $ 345 53/100

Three Hundred Forty-Five and 53/100 Dollars

REDWOOD ROAD OFFICE
CONTINENTAL BANK
4130 So. Redwood Road
Salt Lake City, Utah 84123

For postage for 4,867 letters Iris Heaton

⑆124000041⑆0109 14740785⑈

Rocky Mountain - Bank Note 8 Rainbow White

SHADES OF GRAY ADVERTISING
344 NORTH MAIN
LAYTON, UTAH 84041

1001

Oct 23 1986

1272

97-74/1243

Pay to the order of Utah Republican Party $ 440.00

Four hundred + forty & 00/100 Dollars

BARNES BANKING CO.
33 SOUTH MAIN
KAYSVILLE, UTAH 84037

For Haven Barlow Sonder Bryan Gray

⑆124300741⑆01 0033223⑈ 1001

Rocky Mountain Bank Note 8

BEEF DOLLARS

MR. AND MRS. DAVID ADAMS 3-81
BOX 429 587-2977
MONTICELLO, UTAH 84535

FIRST WESTERN NATIONAL BANK
P.O. BOX 367 • MONTICELLO, UTAH 84535

637

Oct. 22 1986

97-191
1243

PAY One hundred thirty-two dollars and 71/100 DOLLARS $ 132.71

TO THE ORDER OF Utah Repub Party

mad campaign Karen Adams

⑆124301915⑆ 10501023501⑈

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FM 851 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	CURRENCY	COIN	CHECKS (LIST SEPARATELY)	
4/11			Jan Taylor	100 00
			TOTAL FROM OTHER SIDE	
			PLEASE RE-ENTER TOTAL HERE	TOTAL

TOTAL ITEMS 1

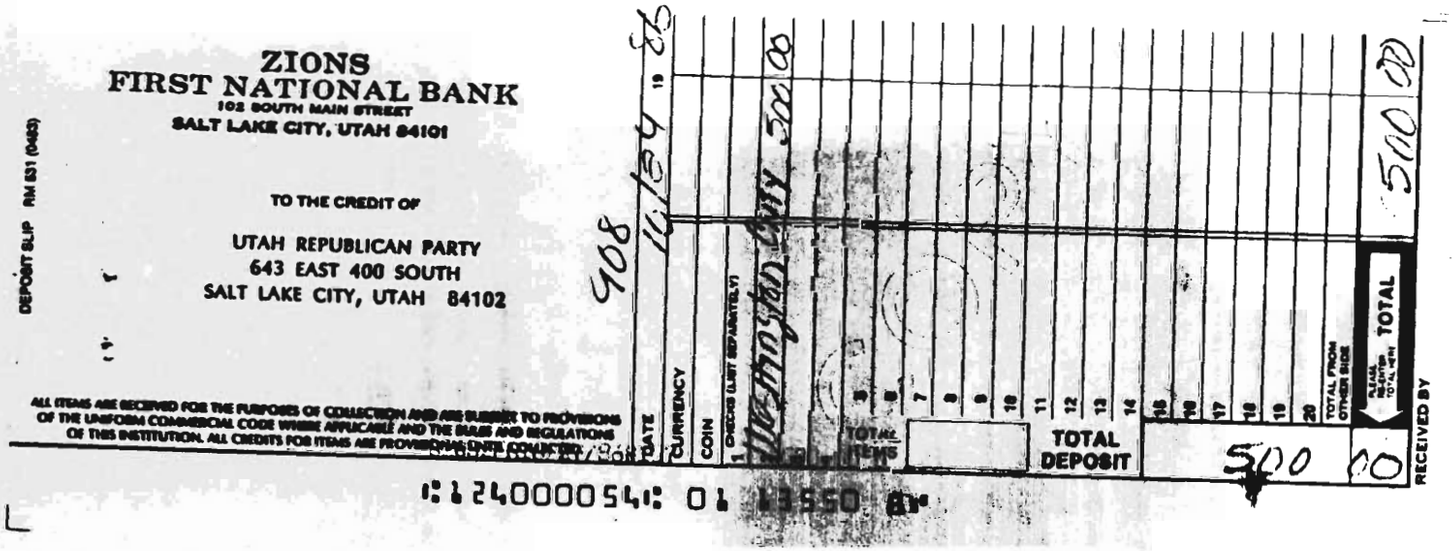
TOTAL DEPOSIT 100 00

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

TOTAL ITEMS
13550 8⑈

1 8 0 2 8 7 0 4 0 0 0



ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 651 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

908 Washington City 300 00

DATE 10 15 84

CURRENCY 500 00

COIN

1 CHECKS (LIST SEPARATELY)

TOTAL ITEMS

TOTAL DEPOSIT 500 00

TOTAL FROM OTHER SIDE

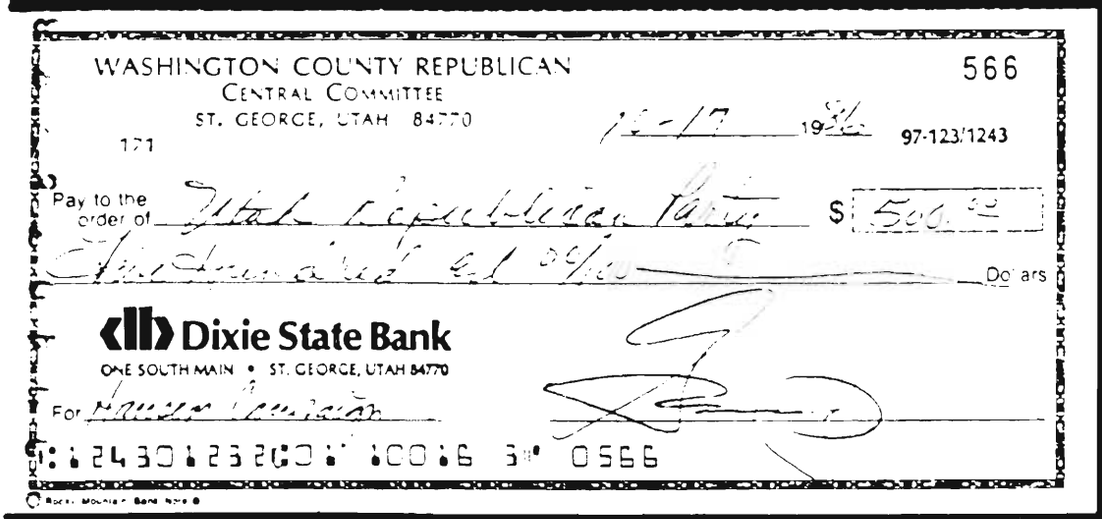
TOTAL 500 00

RECEIVED BY

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⑆124000541⑆ 01 [illegible] 8⑈

7 8 6 2 8 7 0 4 0 0 0



WASHINGTON COUNTY REPUBLICAN
CENTRAL COMMITTEE
ST. GEORGE, UTAH 84770

566

171

10-17 19 86

97-123/1243

Pay to the order of Utah Republican Party $ 500.00

Five hundred and 00/100 Dollars

Dixie State Bank
ONE SOUTH MAIN • ST. GEORGE, UTAH 84770

For Dawson Campaign

⑆124301232⑆ 100 16 5⑈ 0566

DEPOSIT SLIP RM 531 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

	DATE	19 84
1	CURRENCY	50
2	COIN	
3	CHECKS (LIST SEPARATELY)	500
4		1222
5		300
6		
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19		
20	TOTAL FROM OTHER SIDE	
	PLEASE RE-ENTER TOTAL HERE	TOTAL 1350

TOTAL ITEMS

TOTAL DEPOSIT 1350 00

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED. 7/bo

:124000054: 01 3350 8

FAMILY PARTNERSHIP 5-86

4 8 6 2 8 7 0 4 0 0 0

DALLIS A. CHRISTENSEN 1-61
PHYLLIS P. CHRISTENSEN
670 N. UNIVERSITY AVE.
PROVO, UTAH 84601

Advantage

1365

Oct 21 - 96

31-1
1240 33

Pay to the order of Utah Republican Party $ 30.00

Thirty & 00 DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
PROVO OFFICE
82 UNIVERSITY, PROVO, UTAH 84601

For Donation

Dallis A. Christensen

⑆124000121⑆033 11314 17" 1365

ELLIS FAMILY PARTNERSHIP 5-86
444 WEST 610 SOUTH 225-5905
OREM, UTAH 84058

103

10-12 1996

97-228
1243

PAY TO THE ORDER OF Utah Republican Party $ 100-

One Hundred & 00/100 DOLLARS

WASATCH BANK
OF PLEASANT GROVE
225 SOUTH MAIN PLEASANT GROVE, UTAH 84062

MEMO Republican

⑆124302260⑆21 80120 4" 0103

MR. & MRS. LEX L. UDY 6-79
4597 LEDGEMONT DR. 278-4251
SALT LAKE CITY, UTAH 84124

5480

Oct 21 96

97-261
1243

PAY TO THE ORDER OF Utah Republican Party $ 5.00

Five & 00 DOLLARS

COTTONWOOD SECURITY BANK
3825 SOUTH 2300 EAST SALT LAKE CITY, UTAH 84109

FOR Con Mr. & Mrs. Lex L. Udy

⑆124302613⑆11 30313 8" 5480

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 19

CURRENCY 511

COIN 16.34

CHECKS (LIST SEPARATELY) 02 44

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20

TOTAL ITEMS

TOTAL FROM OTHER SIDE

TOTAL

TOTAL DEPOSIT 25 00

RECEIVED BY

⑆240000541⑆ 01 03550 8⑈

9 0 0 4 0 7 8 2 9 8 6

★ MICHAEL L. HENRIE
1255 East Ridge Meadow Lane Apt. # 6 F 562-0470
01/78 Midvale, Utah 84047

1630

10 October 1986

PAY TO THE ORDER OF Utah - G.O.P. $25.00

Twenty five and no/100 DOLLARS

ZIONS FIRST NATIONAL BANK
PANGUITCH OFFICE P.O. BOX 399
PANGUITCH, UTAH 84759

FOR

Michael L Henrie

⑆124301661⑆ 56 30896 8⑈ 1630

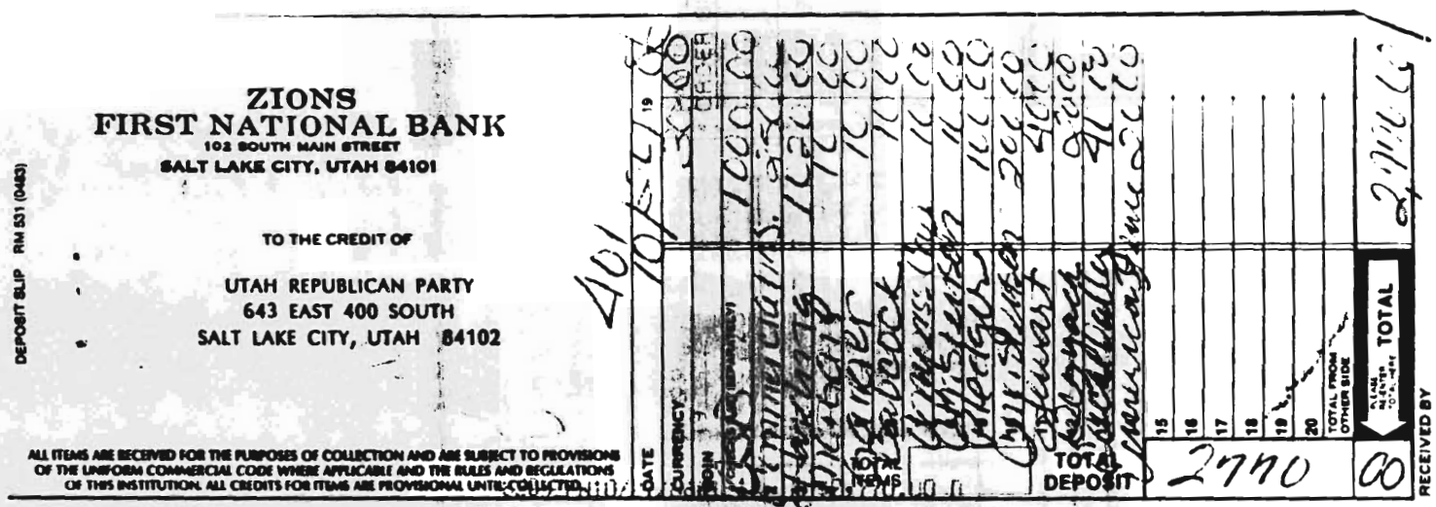
511

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102



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⑆124000054⑆ 01 13590 8⑈

0004078098

HARDING & ASSOCIATES, P.C.
ATTORNEYS AT LAW
306 WEST MAIN P. O. BOX 126 756-7658
AMERICAN FORK, UTAH 84003

774

№ 16920

BANK OF AMERICAN FORK
AMERICAN FORK OFFICE
AMERICAN FORK, UTAH 84003
97-102/1243

PAY ONE THOUSAND TWENTY AND NO/100----------DOLLARS

DATE: October 17, 1986 | AMOUNT: $ 1,020.00

TO THE ORDER OF
UTAH GOVERNOR'S CLUB
Republican Headquarters
643 East 400 South
Salt Lake City, Utah 84102

⑈00169 20⑈ ⑆124301025⑆00 14 2 4 8⑈

SP2000 I C SECURITY PRINTERS, INC.

CONSOLIDATED COMMERCIAL INSURANCE 886
AGENCY OF NORTHERN UTAH, INC.
2655 KIESEL AVE. 627-4440
OGDEN, UT 84401

1047

October 20, 86

97-1/1243

Pay to the order of Governor's Club

$ 250.00**

Two Hundred Fifty no/100 ---------- Dollars

YOUR ENDORSEMENT ON THIS CHECK ACKNOWLEDGES PAYMENT ON THE FOLLOWING ACCOUNT(S).

10/86	1986 Membership	250 00

COMMERCIAL SECURITY BANK
2491 WASHINGTON BLVD.
OGDEN, UT 84401

⑈001047⑈ ⑆124300013⑆ 00007256 1⑈

CSB GOOD GOVERNMENT COMMITTEE
SUITE 1900 P.O. BOX 11869
SALT LAKE CITY, UTAH 84147

№ 153

P 481

COMMERCIAL SECURITY BANK
SALT LAKE CITY, UTAH
31-73/1240

PAY *ONE THOUSAND DOLLARS & no/100***

DATE: 22-Oct-86 | AMOUNT: $ 1,000.00*

TO THE ORDER OF
REPUBLICAN HEADQUARTERS
643 East 400 South
Salt Lake City, UT 84102

GOOD GOVERNMENT COMMITTEE
G. Stephen Torbet

⑆124000737⑆ 50 970008 9⑈

CV Rocky Mountain Bank Note

COMPASS CAPITAL CORPORATION
919 SOUTH 2200 EAST
08/86 SALT LAKE CITY, UTAH 84106

10/23 1986

Pay to the Order of Governor's Club $ 10.00

Ten Dollars

ZIONS FIRST NATIONAL BANK
SUGARHOUSE OFFICE 2200 HIGHLAND DRIVE
SALT LAKE CITY, UTAH 84106

For

⑆124000054⑆ 11 13116 6⑈ 0122

ROBERT F. BABCOCK 9-82
185 S. STATE ST., SUITE 1000 PH. 531-7000
SALT LAKE CITY, UTAH 84111

1984

Oct 20 1986 97-154/1240 34

PAY TO THE ORDER OF Governs Club $ 10.00

Ten and 00/100 DOLLARS

VALLEY BANK & TRUST COMPANY
HEAD OFFICE
185 S. STATE ST. • SALT LAKE CITY, UTAH 84111

MEMO

Robert F Babcock

⑆124001545⑆34 100199⑈ 1984

HUGH C. GARNER 5-80
SPECIAL ACCOUNT
310 S. MAIN ST. PH. 801-532-5660
SALT LAKE CITY, UTAH 84101

3520

Oct 23 1986 97-154/1240 21

PAY TO THE ORDER OF Utah Governors Club $ 10.00

Ten + 00/100 DOLLARS

VALLEY BANK & TRUST COMPANY
BROADWAY - WEST TEMPLE OFFICE
60 WEST THIRD S. • SALT LAKE CITY, UTAH 84101

MEMO

Hugh C Garner

⑆124001545⑆21 126305⑈ 3520

JOHN H. MORGAN, JR.
DAISY R. MORGAN
1454 CHANDLER DR. 955-5023
SALT LAKE CITY, UTAH 84103

2896

Oct 86 97-154/1240

383

Pay to the order of Governs Club $10 00

Ten and No Dollars

HEAD OFFICE
VALLEY BANK & TRUST COMPANY
185 SOUTH STATE STREET, SALT LAKE CITY, UTAH 84111

For

John H Morgan Jr

⑆124001545⑆34 102426⑈ 2896

Rocky Mountain Bank Note

Oregon Court

"011780" 124001545: 21 027633"

SNOW, CHRISTENSEN & MARTINEAU
LAWYERS
10 EXCHANGE PLACE ELEVENTH FLOOR
POST OFFICE BOX 3000
SALT LAKE CITY, UTAH 84110

No 11780

BROADWAY - WEST TEMPLE OFFICE
VALLEY BANK & TRUST CO
80 WEST BROADWAY
SALT LAKE CITY, UTAH 84101
97-154/1240

PAY **Two Hundred and 00/100**

DATE 10/21-86

AMOUNT $**200.00**

TO THE ORDER OF Governor's Club

SNOW, CHRISTENSEN & MARTINEAU · LAWYERS
OFFICE EXPENSE

Thomas S. Rich

"011780" 124001545: 21 027633"

CHARLES V. PLEDGER, M.D., P.C.
JAMESTOWN SQUARE - SUITE 100
3331 NORTH UNIVERSITY AVE
PROVO, UTAH 84604
(801) 373-4300

4264

10-20 19 86

97-20/1243

PAY TO THE ORDER OF Utah Republican Party $ 100.00

One hundred DOLLARS

ZIONS FIRST NATIONAL BANK
PROVO REGION OFFICE P O BOX 737
PROVO, UTAH 84601

FOR Governor Club Dinner

Charles V. Pledger

"004264" 124300204: 32 44101 2"

SNOW, CHRISTENSEN & MARTINEAU
LAWYERS
10 EXCHANGE PLACE ELEVENTH FLOOR
POST OFFICE BOX 3000
SALT LAKE CITY, UTAH 84110

No 11776

BROADWAY - WEST TEMPLE OFFICE
VALLEY BANK & TRUST CO
80 WEST BROADWAY
SALT LAKE CITY, UTAH 84101
97-154/1240

PAY **Ten Dollars and no cents*****

DATE 10/21/86

AMOUNT $**10.00**

TO THE ORDER OF Utah Governor's Club

SNOW, CHRISTENSEN & MARTINEAU LAWYERS
OFFICE EXPENSE

Thomas S. Rich

"011776" 124001545: 21 027633"

CHARLES H. STEWART, M.D.
3311 N. UNIVERSITY AVE. SUITE 100
PROVO, UT 84604

2140

97-154/1240

Oct. 15 1986

Pay to the order of Utah Governor's Club $ 40.00

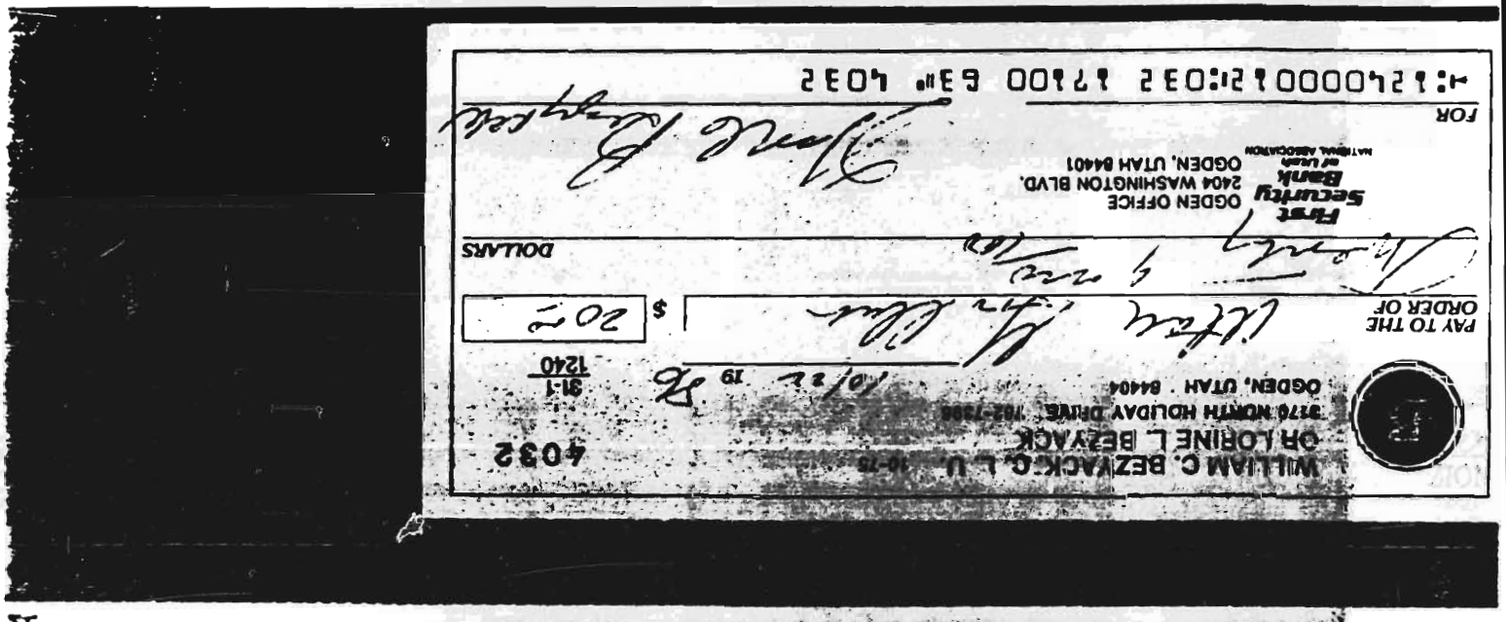
Forty & no/100 Dollars

OREM OFFICE
VALLEY BANK & TRUST COMPANY
1220 SOUTH STATE STREET, OREM, UTAH 84057

Charles Stewart MD.

For Autumn Dinner Reception - Ut. County

⑈002140⑈ ⑆124001545⑆87 027003⑈



CACHE VALLEY ELECTRIC CO.
P.O. BOX 405 • LOGAN, UTAH 84321
PHONE (801) 752-6405

FIRST INTERSTATE BANK
LOGAN, UTAH
97-23
1243

NO. 13609

CHECK NO:

AMOUNT	DATE
****40.00*****	10/22/86

PAY Forty Dollars

EXACTLY D8825 $40.00 CTS

TO THE ORDER OF Governor's Club
Republican Headquarters

CACHE VALLEY ELECTRIC CO.

Marion Stephenson

⑈013609⑈ ⑆124300233⑆ 31 00040 0⑈

AMERICAN FENCE CO. OF OGDEN
CHAIN LINK [redacted]
2939 SOUTH [redacted]T
P.O. BOX 9032
OGDEN, UTAH 84409

COMMERCIAL SECURITY BANK
OGDEN, UTAH
97-1/1243 [redacted]

CHECK NUMBER 0002885

DATE 10-22-86

PAY [redacted] 20and00cts $ 20.00

TO THE ORDER OF
Govern's Club
Republivan Headquarters
643 E. 400 So.
Salt Lake City, Utah 84102

AMERICAN FENCE CO. OF OGDEN

J.R. [redacted]
AUTHORIZED SIGNATURE

"002885" :124300131: 000006957"

[redacted]

DEPOSIT SLIP RM 531 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

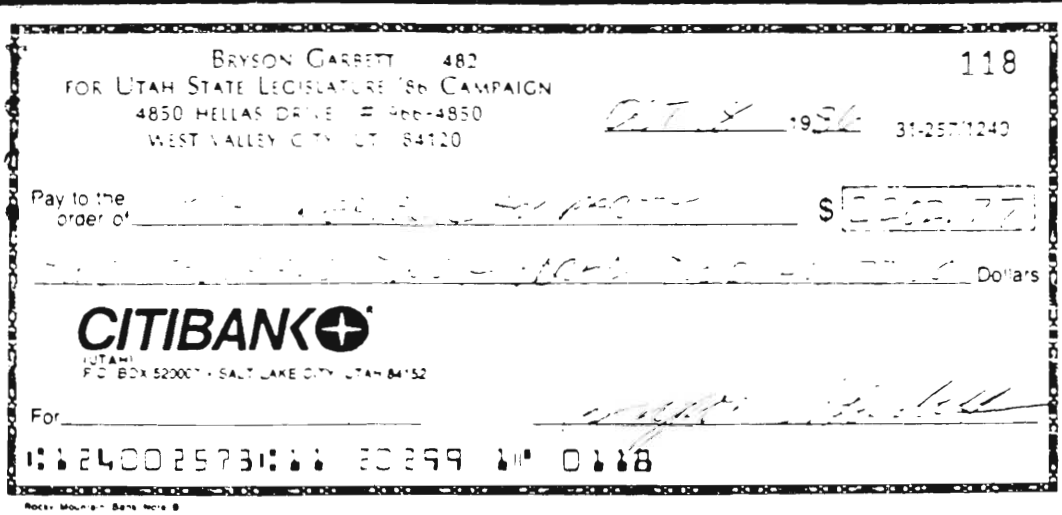
ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

	DATE	CURRENCY	COIN	CHECKS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	TOTAL FROM OTHER SIDE	TOTAL
					406	101	25	22	77																	2202 77
TOTAL ITEMS																										
TOTAL DEPOSIT																										2202 77

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

4 0 0 2 8 7 0 4 0 0 0



BRYSON GARRETT 482
FOR UTAH STATE LEGISLATURE '96 CAMPAIGN
4850 HELLAS DRIVE # 966-4850
WEST VALLEY CITY UT 84120

118

OCT 9 1996

31-257/1240

Pay to the order of [illegible] $ [illegible]

[illegible] Dollars

CITIBANK
(UTAH)
P.O. BOX 52000 • SALT LAKE CITY, UTAH 84152

For [illegible]

⑈240025731⑈ 30399 ⑈ 0118

Rocky Mountain Bank Note ®

Ask about
ZIONS BANK
GOLD ACCOUNT

Deposited with
ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

99-0171

Always obtain an official receipt when making a deposit.

DEPOSIT SLIP RM 631 (9/83)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

604

DATE Oct 29 19 86

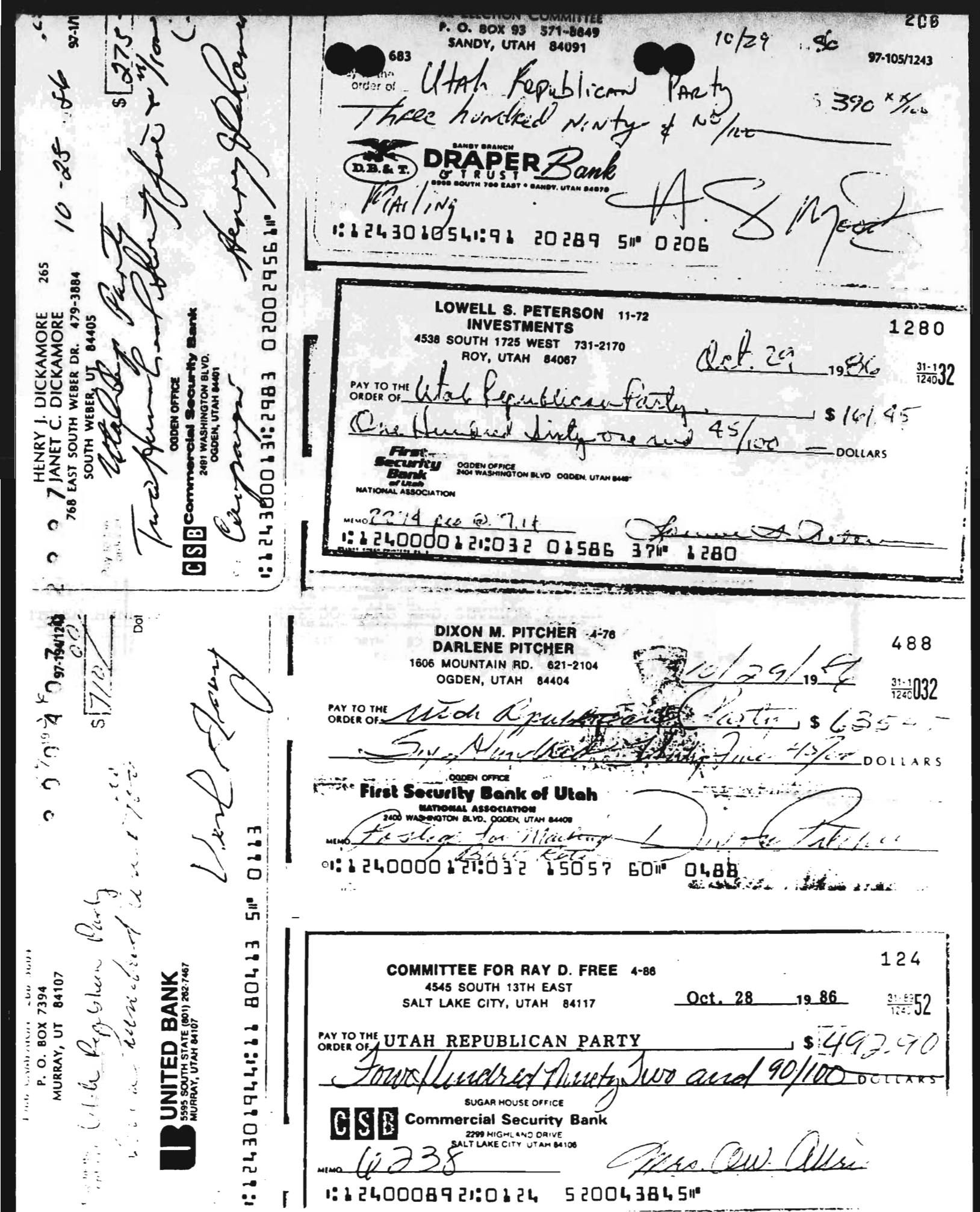
	CHECKS (LIST SEPARATELY)		COIN	CURRENCY
1	Jacobsen	390	00	
2	Peterson	161	45	
3	Pittelman	635	45	
4	Taylor	492	95	
5	Dickamore	275	11	
6	Asay	710	00	
7	Wunderlich	316	73	
8	Hollingshurst	94	09	
9	Alford	330	15	
10	Peterson	134	90	
11	Bullens	354	86	
12	Merrill	368	49	
13	Cook	56	80	
14	Reese	393	77	
15				
16				
17				
18				
19				
20	TOTAL FROM OTHER SIDE			
	TOTAL	4714	70	
TOTAL ITEMS		TOTAL DEPOSIT	4714	70

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑈124000054⑈ 01 13550 8⑈

0004078200



P. O. BOX 93 571-8649
SANDY, UTAH 84091

206

683

10/29 86

97-105/1243

Pay to the order of Utah Republican Party $ 390 xx/100

Three hundred Ninty & no/100

SANDY BRANCH
D.B.&T. DRAPER Bank & TRUST
8998 SOUTH 700 EAST • SANDY, UTAH 84070

Mailing

⑆124301054⑆91 20289 5⑈ 0206

HENRY J. DICKAMORE 265
JANET C. DICKAMORE
768 EAST SOUTH WEBER DR. 479-3884
SOUTH WEBER, UT 84405

10-25 86

$ 275 xx/100

Utah Republican Party

Two Hundred Seventy Five & xx/100

Henry J Dickamore

CSB Commercial Security Bank
OGDEN OFFICE
2401 WASHINGTON BLVD.
OGDEN, UTAH 84401

⑆124300131⑆2983 020029561⑈

LOWELL S. PETERSON 11-72
INVESTMENTS
4538 SOUTH 1725 WEST 731-2170
ROY, UTAH 84067

1280

Oct. 29 19 86

31-1/1240 32

PAY TO THE ORDER OF Utah Republican Party $ 161.45

One Hundred Sixty One and 45/100 DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
OGDEN OFFICE
2404 WASHINGTON BLVD OGDEN, UTAH 8440

MEMO 2214 due @ 7.1%

⑆124000121⑆032 01586 37⑈ 1280

DIXON M. PITCHER 4-76
DARLENE PITCHER
1606 MOUNTAIN RD. 621-2104
OGDEN, UTAH 84404

488

10/29/86

31-1/1240 032

PAY TO THE ORDER OF Utah Republican Party $ 63.50

Sixty Three and 50/100 DOLLARS

OGDEN OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
2400 WASHINGTON BLVD. OGDEN, UTAH 84409

MEMO Postage for Mailing Dixon Pitcher

⑆124000121⑆032 15057 60⑈ 0488

P. O. BOX 7394
MURRAY, UT 84107

97-194/1240

$ 7.12

Utah Republican Party

UNITED BANK
5595 SOUTH STATE (801) 262-7467
MURRAY, UTAH 84107

⑆124301944⑆11 80413 5⑈ 0113

COMMITTEE FOR RAY D. FREE 4-86
4545 SOUTH 13TH EAST
SALT LAKE CITY, UTAH 84117

124

Oct. 28 19 86

31-69/1240 52

PAY TO THE ORDER OF UTAH REPUBLICAN PARTY $ 492.90

Four Hundred Ninety Two and 90/100 DOLLARS

SUGAR HOUSE OFFICE
CSB Commercial Security Bank
2299 HIGHLAND DRIVE
SALT LAKE CITY UTAH 84106

MEMO 0238

Geo. W. Allen

⑆124000892⑆0124 52004384 5⑈

COOK

1178

COOK SLURRY COMPANY
COOK ASSOCIATES INC.
2026 BENEFICIAL LIFE TOWER 533-0299
SALT LAKE CITY, UTAH 84111

11470

ZIONS FIRST NATIONAL BANK
Head Office
One South Main Street
Salt Lake City, Utah 84111
31-5/1240
35817-36T

PAY Fifty Six and 80/100 Dollars----------

DATE: October 27, 1986

AMOUNT: $ 56.80

TO THE ORDER OF: Republican Party of Utah

⑈011470⑈ ⑆124000054⑆ 02 15626 3⑈

Rocky Mountain Bank Note

STEPHEN J. REES RE-ELECTION CAMPAIGN FUND
5716 JORDAN CANAL ROAD 969-9937
SALT LAKE CITY, UTAH 84118

№ 1014

ZIONS
FIRST NATIONAL BANK
TAYLORSVILLE, UTAH 84107
31-5/1240

PAY THREE HUNDRED NINTY THREE DOLLARS AND SEVENTY SEVEN CENTS

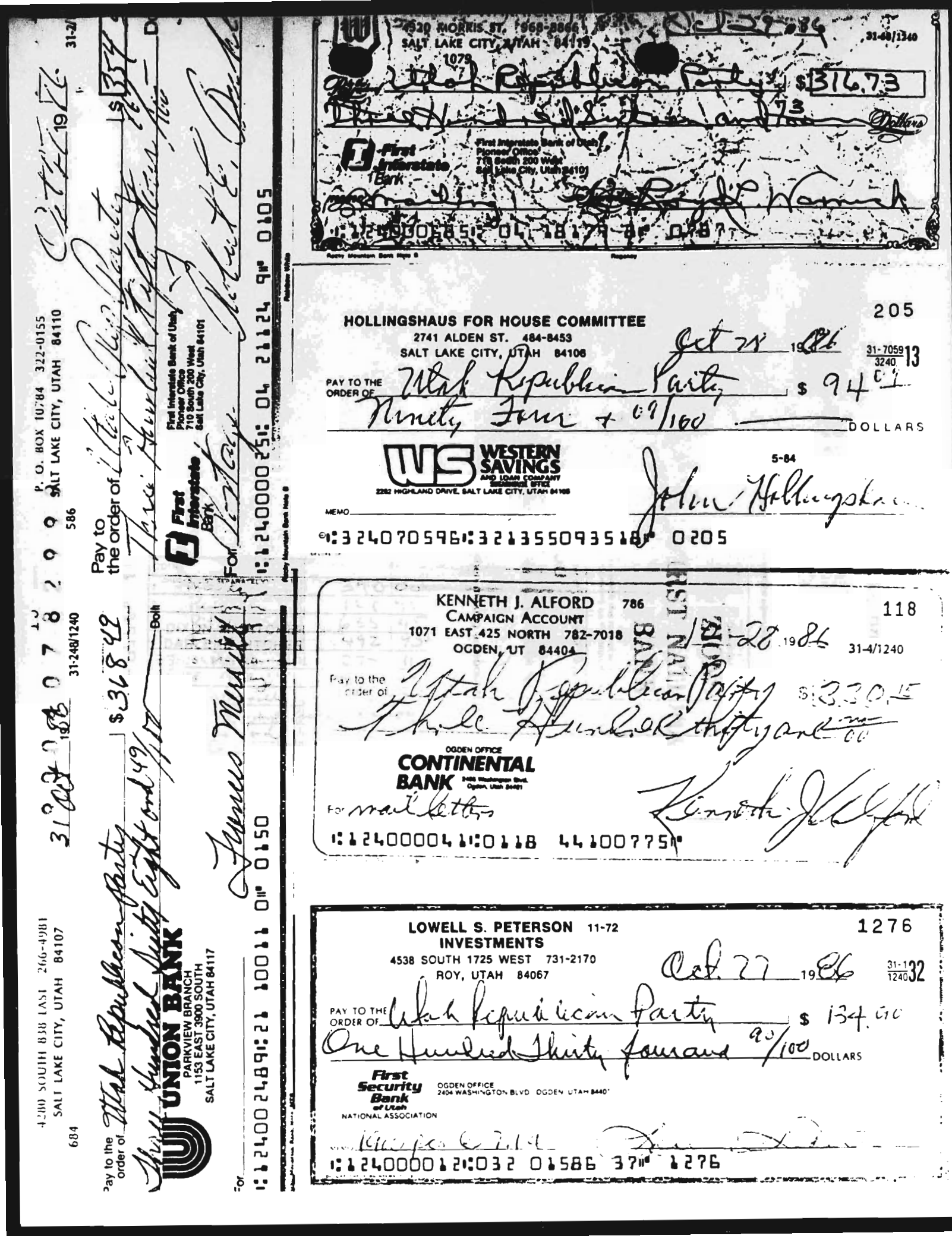
DATE: 10-27-86

AMOUNT: $ 393.77

TO THE ORDER OF: Utah Republican Party

⑈001014⑈ ⑆124000054⑆ 09 74511 8⑈

V Rocky Mountain Bank Note



4520 MORRIS ST. 968-8866
SALT LAKE CITY, UTAH 84119
1079
31-40/1340
Pay to the Utah Republican Party $316.73
Three Hundred Sixteen and 73/100 Dollars
First Interstate Bank
First Interstate Bank of Utah
Pioneer Office
710 South 200 West
Salt Lake City, Utah 84101
Memo
:124000851: 04 18179 8: 0787

HOLLINGSHAUS FOR HOUSE COMMITTEE
2741 ALDEN ST. 484-8453
SALT LAKE CITY, UTAH 84106
205
Oct 28 1986
31-7059/3240 13
PAY TO THE ORDER OF Utah Republican Party $ 94.07
Ninety Four + 07/100 DOLLARS
WESTERN SAVINGS AND LOAN COMPANY
2252 HIGHLAND DRIVE, SALT LAKE CITY, UTAH 84106
5-84
MEMO
John Hollingshaus
⑆324070596⑆ 32135509351⑇ 0205

KENNETH J. ALFORD 786
CAMPAIGN ACCOUNT
1071 EAST 425 NORTH 782-7018
OGDEN, UT 84404
118
10/28 1986
31-4/1240
Pay to the order of Utah Republican Party $330.15
Three Hundred Thirty and 15/100
OGDEN OFFICE
CONTINENTAL BANK
1455 Washington Blvd.
Ogden, Utah 84401
For mail letters
Kenneth J. Alford
:124000041:0118 44100775⑈

LOWELL S. PETERSON 11-72
INVESTMENTS
4538 SOUTH 1725 WEST 731-2170
ROY, UTAH 84067
1276
Oct. 27 1986
31-1/1240 32
PAY TO THE ORDER OF Utah Republican Party $ 134.00
One Hundred Thirty four and 00/100 DOLLARS
First Security Bank of Utah NATIONAL ASSOCIATION
OGDEN OFFICE
2404 WASHINGTON BLVD. OGDEN, UTAH 84401
:124000012:032 01586 37⑈ 1276

P. O. BOX 10784 322-0155
SALT LAKE CITY, UTAH 84110
586
Pay to the order of Utah Republican Party $ 368.49
Three Hundred Sixty Eight and 49/100 Dollars
31 Oct 1986
First Interstate Bank of Utah
Pioneer Office
710 South 200 West
Salt Lake City, Utah 84101
For Finance Committee
:124000248: 21 10011 0⑈ 0150

4280 SOUTH 858 EAST 266-4981
SALT LAKE CITY, UTAH 84107
684
Pay to the order of Utah Republican Party $ 1,000.00
One Thousand and 00/100 Dollars
31 Oct 1986
UNION BANK
PARKVIEW BRANCH
1153 EAST 3900 SOUTH
SALT LAKE CITY, UTAH 84117
For
:124002489: 21 10011 0⑈ 0150

Ask about
ZIONS BANK
GOLD ACCOUNT

Deposited with
ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

99-0171 Always obtain an official receipt when making a deposit

DEPOSIT SLIP RM 831 (0/83)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

511

| | | |

[redacted]
4944 MARILYN DRIVE 278-1613
SALT LAKE CITY, UTAH 84117

[redacted]83

16 Oct 1986

97-105/1243

Pay to the order of Utah Republican Party $10.00

Ten and 00/100 Dollars

D.B.&T. DRAPER Bank & TRUST
083 EAST 12300 SOUTH PH. 571-3141
P.O. BOX 999 DRAPER, UTAH 84020

For donation

Samuel A. Sorenson

⑈124301054⑈81 50771 7⑈ 0611

KARL R. JOHNSON 8-82
DONNA L. JOHNSON
354 EAST 50 NORTH 563-6608
SMITHFIELD, UTAH 84335

857

10/25 1986

31-1
1240

PAY TO THE ORDER OF Utah Republican Party $ 10.00

THE SUM TEN DOLLS 00 CTS DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
SMITHFIELD OFFICE
10 NORTH MAIN
SMITHFIELD, UTAH 84335

FOR Donation

Donna L. Johnson

⑆124300001⑆01.2 101.27 LC⑈ 0857

KEITH L STAHLE
Attorney at Law
84 SOUTH MAIN
BOUNTIFUL, UTAH 84010

No 8218

Oct 24 1986

97-56
1243

PAY TO THE ORDER OF Utah Republican Party $15.00

Fifteen and No/100 DOLLARS

BOUNTIFUL STATE OFFICE
ZIONS FIRST NATIONAL BANK
BOUNTIFUL, UTAH 84010

Keith L Stahle

⑈124300056⑈ 21 20288 2⑈

E. H. THRONDSEN 868
2155 PANORAMA WAY
SALT LAKE CITY, UTAH 84124

6828

97-154/1240

10-22 1986

Pay to the order of Utah GOP $50.00

Fifty + no/100 Dollars

CITY CENTER OFFICE
VALLEY BANK & TRUST COMPANY
1325 SOUTH MAIN, SALT LAKE CITY, UTAH 84115

For

E H Throndsen

⑈006828⑈ ⑈124001545⑈10 10171 3⑈

Ask about

ZIONS BANK

GOLD ACCOUNT

Deposited with

ZIONS FIRST NATIONAL BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

99-0171 Always obtain an official receipt when making a deposit

DEPOSIT SLIP, RM 631 (0483)

ZIONS FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

	DATE	19	CURRENCY	COIN	CHECKS (LIST SEPARATELY)	
	Oct 29	84		60	1020	
2				00	200	
3				50	1000	
4				42	112	
5				00	2500	Vincent, Bo
6				00	200	Portillo
7				00	320	Arnold
8						
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11						
12						
13						
14						
15						
16						
17						
18						
19						
20					TOTAL FROM OTHER SIDE	
					TOTAL ITEMS	

TOTAL 5312 42

TOTAL DEPOSIT ~~5043~~ 42

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

5,312 42

700407830 02

JIM HANSE[redacted]OMMITTEE 1083
P.O. BOX 654
FARMINGTON, UT 84025

2001

DAVIS COUNTY BANK
12 West State
Farmington, Utah 84025

97-63/1243
44480-365

PAY One hundred twelve & 42/100 Dollars

DATE 10-28-86

AMOUNT $ 112.42

TO THE ORDER OF
Utah State Republican Party
643 East 400 South
Salt Lake City, UT 84102

Howard C. Nielson

⑈002001⑈ ⑆124300631⑆ 21 00535 48⑈

VAN COTT, BAGLEY, CORNWALL & McCARTHY
A PROFESSIONAL CORPORATION
ATTORNEYS-AT-LAW
50 SOUTH MAIN STREET, SUITE 1600
SALT LAKE CITY, UTAH 84144-0450

CSB TOWER OFFICE
COMMERCIAL SECURITY BANK
SALT LAKE CITY, UTAH

104937

31-73
1240

10/23/86

PAY **********EXACTLY******2,500.00***DOLLARS $2,500.00**

TO THE ORDER OF
Utah Republican Party

VAN COTT, BAGLEY, CORNWALL & McCARTHY

Richard K. Sagen

⑈104937⑈ ⑆124000737⑆ 580004448⑈

PEMBROKE'S
363 SOUTH 500 EAST
SALT LAKE CITY, UTAH 84102

THE CONTINENTAL BANK & TRUST CO.
FOURTH SO. BRANCH
P.O. BOX 30177
SALT LAKE CITY, UTAH 84125

31-4
1240

CHECK NO. 2056

FOLIO NO. 000200

MO 10 DAY 25 YR 86

A.H. PEMBROKE @ 200 DOLS 00 CTS
THE SUM OF DOLLARS AND CENTS

PAY THIS AMOUNT $ 200.00

PEMBROKE'S

PAY TO THE ORDER OF
THE REPUBLICAN PARTY OF UTAH

⑈000200⑈ ⑆124000041⑆ 197100 24⑈

TRUSTEE RGA TRUST
1728 EAST 6525 SOUTH
SALT LAKE CITY, UTAH 84121

1282

1082

Oct. 19 1986 31-4/1240

Pay to the order of Utah Republican Party $ 300 00

Three Hundred & no/100 Dollars

THE CONTINENTAL BANK & TRUST CO.
MAIN OFFICE
200 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

For Hinman - Hansen ctr. Robert B. Rawle

⑆124000041⑆1082 0212308⑈

Rocky Mountain Bank Note 8

SNYDERVILLE MANAGEMENT CO., INC. 886
4000 PARK WEST DRIVE
PARK WEST, UT 84060

1003

10/22 1986 97-250/1243

Pay to the Order of Utah Republican Party $ 1,000 00

One Thousand & no/100 Dollars

Industrial Office
BRIGHTON BANK
1735 S. 300 W. • Salt Lake City, Utah 84115

For 1987 GC?

⑆124302503⑆31 90054 1⑈ 1003

Rocky Mountain Bank Note 8

D. L. OR LOIS W. DUNN
3947 YALECREST AVENUE
SALT LAKE CITY, UTAH 84108

150

3182

Oct 19 1986 31-1/1240

Pay to the order of Utah Republican Party $ 200 00

Two Hundred & no/100 Dollars

MAIN AT FIRST SOUTH OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION
79 SO. MAIN • SALT LAKE CITY, UTAH 84111

For Reception

⑆124000012⑆051 12524 13⑈ 3182

Rocky Mountain Bank Note 8

---

97 28
1243

FIRST SECURITY BANK OF UTAH
NATIONAL ASSOCIATION
BRIGHAM CITY UTAH

DATE 27 Oct 1986 NO

PAY TO THE ORDER OF Jim Hansen Campaign $ 1000 00

One Thousand and no/100 DOLLARS

BOX ELDER COUNTY
REPUBLICAN CENTRAL COMMITTEE
BRIGHAM CITY, UTAH 84302

Dan Castle

⑆1243⑈0028⑆ 39 13374 17⑈

0 0 0 4 0 7 8 3 0 4

DEPOSITED WITH

ZIONS FIRST NATIONAL BANK

FIRST SOUTH OFFICE
102 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

ALL ITEMS ARE RECEIVED BY THIS BANK FOR PURPOSES OF COLLECTION AND ARE SUBJECT TO THE UNIFORM COMMERCIAL CODE. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 10/3/1926

CURRENCY

COIN

CHECKS (LIST SEPARATELY)

54-5	31 00
Blumenthal	31 00

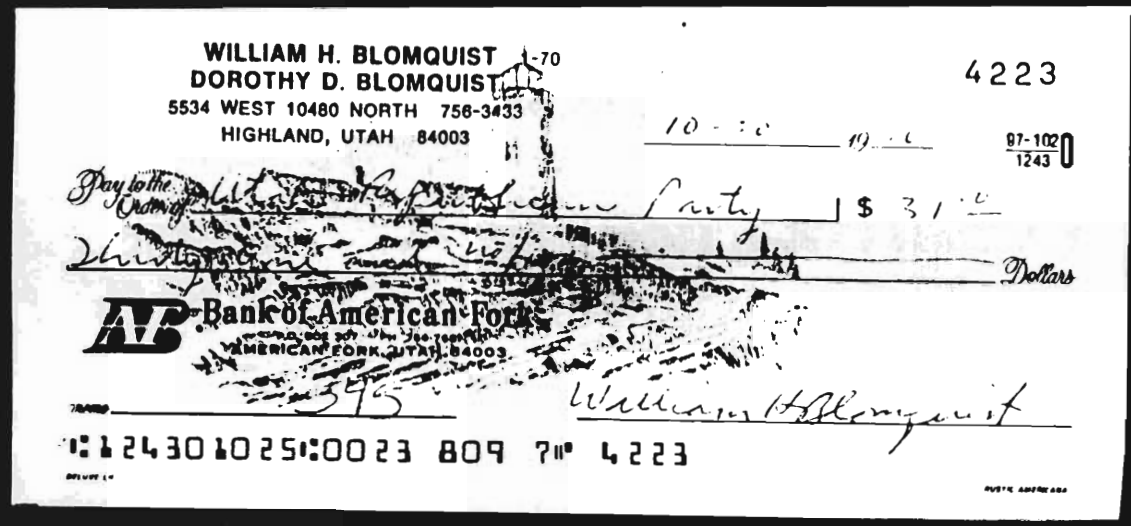
TOTAL FROM OTHER SIDE

TOTAL 31.00

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

C C C 2 3 2 0 4 C C C



WILLIAM H. BLOMQUIST
DOROTHY D. BLOMQUIST
5534 WEST 10480 NORTH 756-3433
HIGHLAND, UTAH 84003

4223

97-102
1243

Pay to the Order of [illegible] $ 31.00

[illegible] Dollars

Bank of American Fork
AMERICAN FORK, UTAH 84003

545

William H Blomquist

⑆124301025⑆0023 809 7⑈ 4223

DEPOSIT SLIP RM 531 (0483)

ZIONS FIRST NATIONAL BANK
10 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

Ed 4

DATE	10/31/86	
CURRENCY		
COIN		
CHECKS (LIST SEPARATELY)	[illegible] 1130	85
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17		
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19		
20		
TOTAL FROM OTHER SIDE		
TOTAL	1130	85

TOTAL ITEMS

TOTAL DEPOSIT 1130 85

RECEIVED BY

:124000054: 01 13550 8

1.13065

9004078300 7

MAIN OFFICE

THE CONTINENTAL BANK AND TRUST COMPANY

31-4/1240

Salt Lake City, Utah

No 344504

OCT 30 86

PAY TO THE ORDER OF :UTAH REPUBLICAN SENATE CAMPAIGN COMM.: $1130.85

CONTINENTAL BANK & TRUST 1,130 85 CTS DOLLARS

Purchased By RICHARD CARLING

CASHIER'S CHECK

AUTHORIZED SIGNATURE

Jane Hansen

:"034504" :124000041: 00 30.001"

[redacted]

DEPOSITED WITH

ZIONS FIRST NATIONAL BANK

FIRST SOUTH OFFICE
102 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

ALL ITEMS ARE RECEIVED BY THIS BANK FOR PURPOSES OF COLLECTION AND ARE SUBJECT TO THE UNIFORM COMMERCIAL CODE. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE 5/1/1986

CURRENCY

COIN

CHECKS (LIST SEPARATELY) Hand 10 00

TOTAL FROM OTHER SIDE

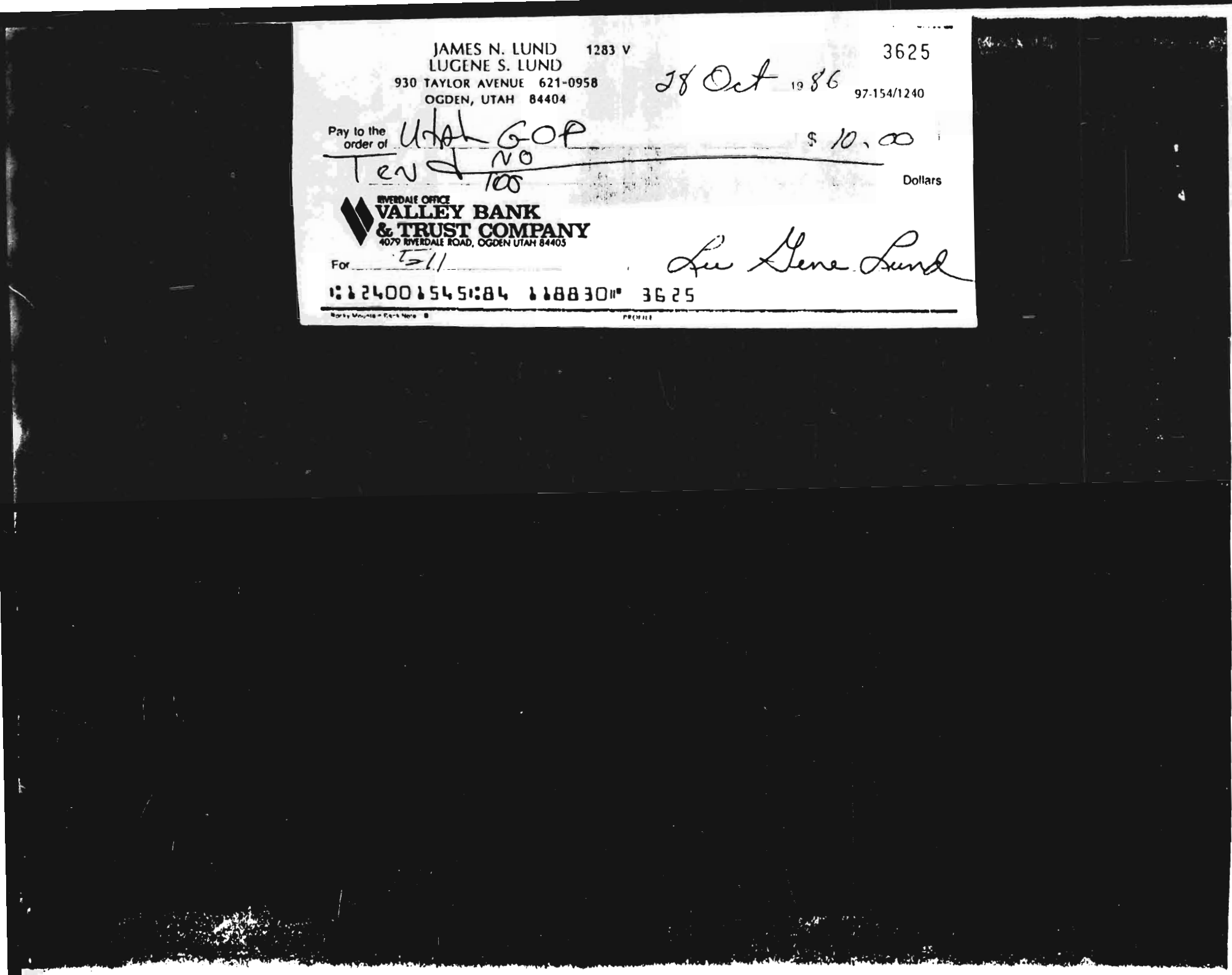
TOTAL 10 00

PLEASE RE-ENTER TOTAL HERE 10.00

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

6 0 0 8 8 4 0 7 0 0 0



JAMES N. LUND 1283 V
LUGENE S. LUND
930 TAYLOR AVENUE 621-0958
OGDEN, UTAH 84404

3625

18 Oct 19 86

97-154/1240

Pay to the order of Utah GOP $ 10.00

Ten and no/100 Dollars

RIVERDALE OFFICE
VALLEY BANK & TRUST COMPANY
4079 RIVERDALE ROAD, OGDEN UTAH 84405

For Toll

Lee Gene Lund

⑈124001545⑆84 ⑆88830⑈ 3625

DEPOSITED WITH

ZIONS FIRST NATIONAL BANK

FIRST SOUTH OFFICE
102 SOUTH MAIN
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

Utah Republican Party
643 East 400 South
Salt Lake City, Utah 84102

ALL ITEMS ARE RECEIVED BY THIS BANK FOR PURPOSES OF COLLECTION AND ARE SUBJECT TO THE UNIFORM COMMERCIAL CODE. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	10/31/19 84	
CURRENCY		10 00
COIN		5 00
CHECKS (LIST SEPARATELY)	501 [illegible]	
	[illegible]	
TOTAL FROM OTHER SIDE		15 00
TOTAL (PLEASE RE-ENTER TOTAL HERE)	15.00	

RECEIVED BY

⑆240000541⑆ 01 13550 8⑈

⑈110 2 8 7 0 4 0⑈ 0 0

AMERICAN EXPRESS MONEY ORDER

82-40
1021

ZIONS
FIRST NATIONAL BANK
SALT LAKE CITY, UTAH

04-318,922,583

PAY THE SUM OF
NOT GOOD OVER $1,000

DATE 17 Oct, 19 86

ZIONS FIRST NATIONAL BANK 5 AND 00 CTS

TO THE ORDER OF Utah Republican Party

M. L. Whitworth, P.O. Box 977, Logan, Utah - 84321
SENDER'S NAME AND ADDRESS

BEFORE CASHING READ NOTICE ON BACK

Issued by American Express Travel Related Services Company, Inc.
Englewood, Colorado

Payable at InterWest Bank of Grand Junction
Grand Junction, Colorado

⑆102100400⑆04 ⑈318922583⑈

501

LT. COL. DANIEL J. RINGLE, USAF RET. 8-83
LOANA H. RINGLE
SSN. 512-10-4748
1624 EAST 1140 NORTH
LOGAN, UTAH 84321

824

97-7048
3243

Pay to the Order of Utah Republican Party $ 10.00

Ten and no 100 Dollars

LOGAN OFFICE
LOGAN SAVINGS
399 NORTH MAIN • LOGAN, UTAH 84321

For Political Contribution Daniel J. Ringle

⑆324370487⑆0204 600⑆90⑆7⑈ 0824

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 531 (0485)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

804 10/31/80

DATE	CURRENCY	COIN				5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	TOTAL FROM OTHER SIDE	TOTAL
																							47

ENTER TOTAL HERE

TOTAL ITEMS

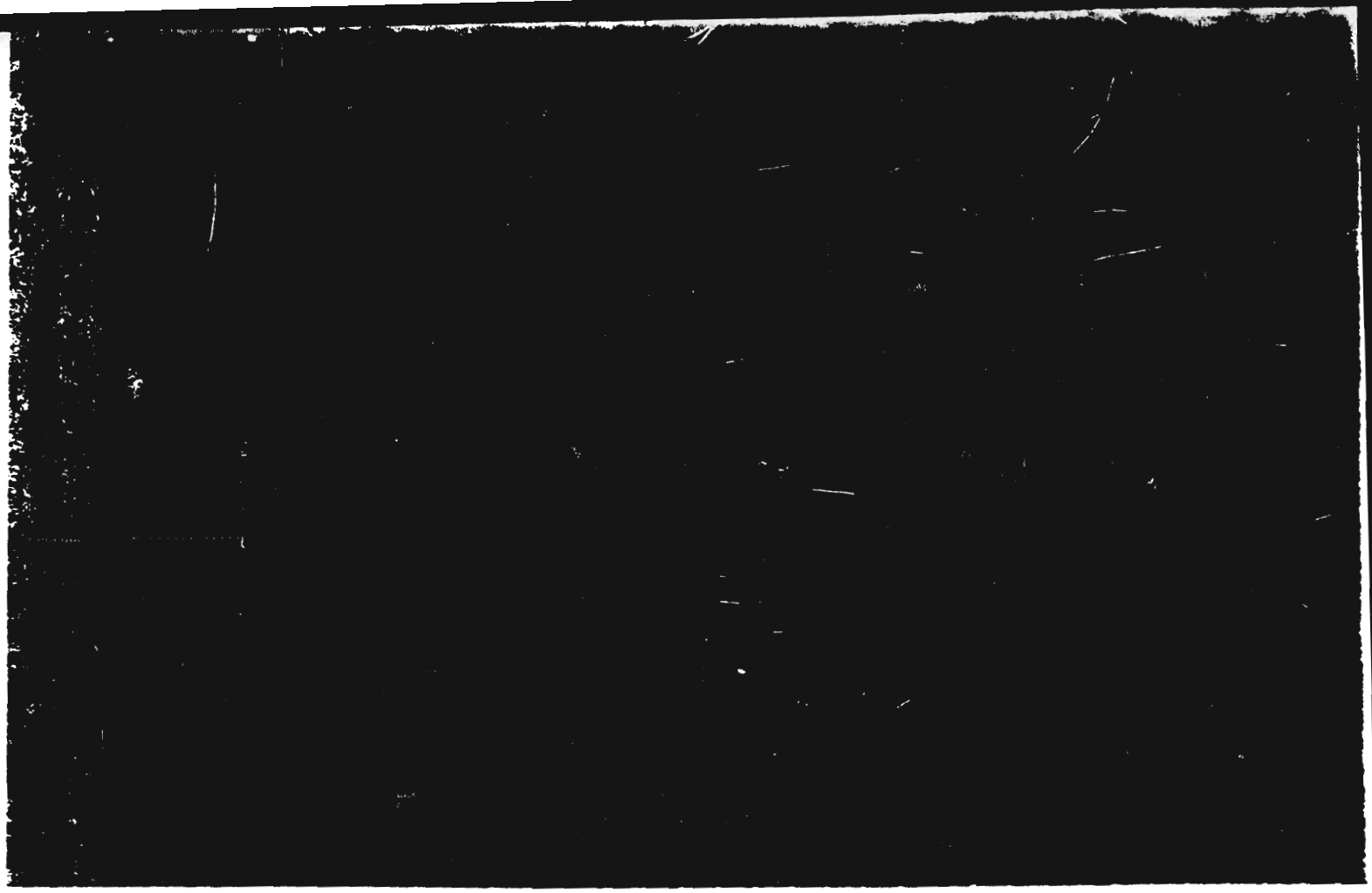
TOTAL DEPOSIT 400

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑈124000054⑈ 01 63550 8⑈

0 0 0 4 0 7 8 3 0 1 3



DESCRIPTION

political contribution

BEEHIVE OFFICE
COMMERCIAL SECURITY BANK
SALT LAKE CITY, UTAH 84111
34-78 1240

No 4454

DATE October 29 19[illegible]

Pay FOUR HUNDRED AND 00/100---------- Dollars $ 400.00

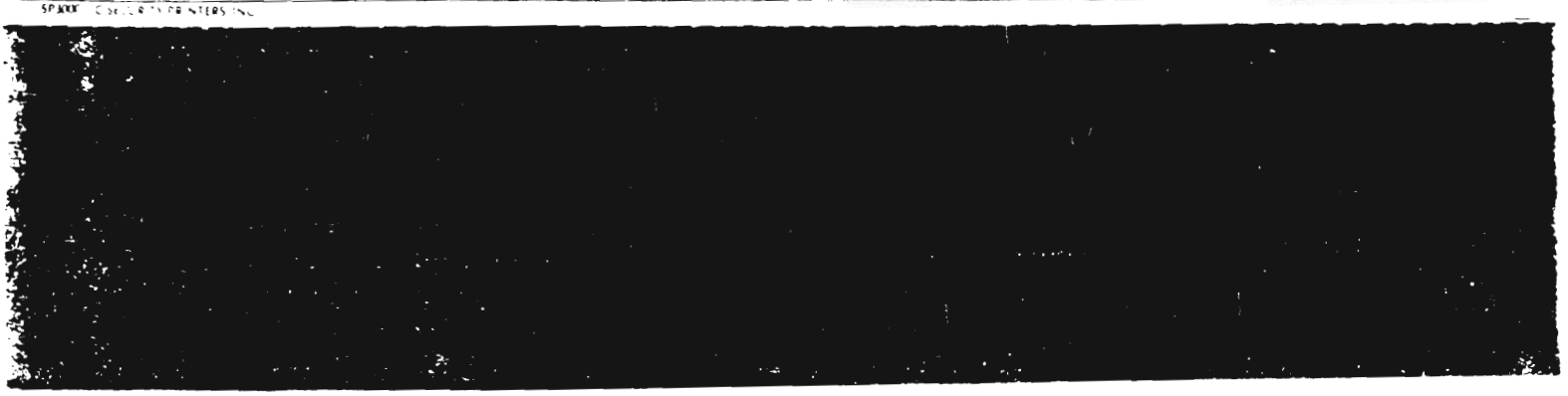
TO THE ORDER OF UTAH REPUBLICAN PARTY

E. R. DUMKE, JR.
2159 South 700 East, Suite 200
Salt Lake City, Utah 84106
467-3600

E. R. Dumke, Jr.

⑈000445⑈ ⑆124000737⑆ 55824920⑈

SPARK CHECK PRINTERS INC



ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP RM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

401

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE		Oct 29 19 86	
CURRENCY			
COIN			
CHECKS (LIST SEPARATELY)	1	Reed	10 00
	2	Smedley	10 00
	3	1 Lincoln	250 00
	4	Priest	40 00
TOTAL ITEMS	5		
	6		
	7		
	8		
	9		
	10		
	11		
	12		
TOTAL DEPOSIT	13		
	14		
310	15		
	16		
	17		
	18		
	19		
	20		
	TOTAL FROM OTHER SIDE		
00	PLEASE RE-ENTER TOTAL HERE → TOTAL		310 00

RECEIVED BY

:121000042: 8550 10 "

Always obtain an official receipt when making a deposit.

99 0171

Deposited with
ZIONS
FIRST NATIONAL
BANK

The deposit for which this receipt is issued is accepted subject to the conditions appearing on the deposit tickets furnished by this bank

The bank symbol, transaction number, date and amount of your deposit are shown below

THANK YOU

Ask about
ZIONS BANK
GOLD
ACCOUNT

0 0 0 4 0 7 8 4 0 0 1 3

560 E. SOUTH TEMPLE #1107 364-3171
SALT LAKE CITY, UTAH 84102

10-23 19 86

1534

31-273/1240

Pay to the order of Utah Governor's Club $ 10.00

Ten Dollars

CITY CENTER OFFICE
GUARDIAN STATE BANK
142 EAST 200 SOUTH
SALT LAKE CITY, UTAH 84111

For Gov. Club Mtg

Douglas L Bentley

⑈124002735⑈ 30035 31⑈ 1534

Rocky Mountain Bank Note 8

MARK ADAM REEB 385
OR HAROLD H. REEB OR JANICE L. REEB
SUNDANCE C-6 225-7317
PROVO CANYON, UTAH 84604

666

10-27 19 86

31-1/1240

Pay to the order of Utah Gov. Club $ 10.00

Ten only Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
OREM OFFICE
35 North State
Orem, Utah 84057

For

Janice L Reeb

⑈124000121⑈184 12600 22⑈ 0666

Rocky Mountain Bank Note 2

Copyright Form No. 2

ADAMSON ENGINEERING
A PROFESSIONAL CORPORATION
3670 QUINCY RM 201
OGDEN, UTAH 84403

6246

97-1/1243

1074

October 21 19 86

Pay to the order of Governor's Club $ 250.00

** Two Hundred Fifty and no/100 ********** Dollars

OGDEN OFFICE
CSB Commercial Security Bank
2491 WASHINGTON BLVD.
OGDEN, UTAH 84401

ADAMSON ENGINEERING
A PROFESSIONAL CORPORATION

For

⑈006246⑈ ⑆124300131⑆ 00001958 5⑈

ACCOUNT

0 0 0 4 0 7 8 3 0

BANK

D. RICHARD L. PRIEST 7-85
ARCHITECT, INC.
290 - 25TH ST., NO. 209 621-1493
OGDEN, UTAH 84401

HARRISON OFFICE
CSB Commercial Security Bank
3565 HARRISON BLVD.
OGDEN, UTAH 84403

1606

October 24, 1986

97-1/1243 33

PAY Forty and no/100---------- DOLLARS $40.00***

TO THE ORDER OF Utah Governor's Club

Duane Laird

DEPOSIT SLIP RM 531 (0483)

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

DATE	10/31/22
CURRENCY	
COIN	
CHECKS (LIST SEPARATELY) 1	25 00
2	47 50
3	54
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
TOTAL FROM OTHER SIDE	
TOTAL ITEMS	
TOTAL DEPOSIT	782 74
TOTAL	7582 74

RECEIVED BY

⑆124000054⑆ 01 13550 8⑈

⑈0040783017⑈

COMMITTEE FOR RAY D. FREE 4-86
4545 SOUTH 13TH EAST
SALT LAKE CITY, UTAH 84117

125

OCT. 39 19 86

31-89/1240 52

PAY TO THE ORDER OF UTAH REPUBLICAN PARTY $ 41.24

Forty One and 24/100 DOLLARS

SUGAR HOUSE OFFICE
Commercial Security Bank
2299 HIGHLAND DRIVE
SALT LAKE CITY, UTAH 84106

MEMO 581

Mrs D.W. Allred

⑈124000892⑆0125 52004384511⑈

DIXON M. PITCHER 4-76
DARLENE PITCHER
1606 MOUNTAIN RD. 621-2104
OGDEN, UTAH 84404

515

10/29/19 86

31-1/1240 032

PAY TO THE ORDER OF Utah Republican Party $ 75.00

Seventy Five DOLLARS

OGDEN OFFICE
First Security Bank of Utah
NATIONAL ASSOCIATION

MEMO Campaign Contribution

Darlene Pitcher

⑈124000012⑆032 ⑆5057 60⑈ 0515

Postage

OLENE WALKER 886
CAMPAIGN FUND
870 HILLTOP ROAD
SALT LAKE CITY, UT 84103

327

Oct 31 19 86

97-154/1240

Pay to the order of Utah Republican Party $ 666 00

Six Hundred Sixty Six and 00/100 Dollars

HEAD OFFICE
VALLEY BANK & TRUST COMPANY
185 SOUTH STATE STREET, SALT LAKE CITY, UTAH 84111

Memo

Olene Walker

⑈124001545⑆34 018492⑈ 0327

ZIONS
FIRST NATIONAL BANK
102 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101

DEPOSIT SLIP FIM 531 (0483)

TO THE CREDIT OF

UTAH REPUBLICAN PARTY
643 EAST 400 SOUTH
SALT LAKE CITY, UTAH 84102

401 10/31 19 86

DATE

CURRENCY

COIN

CHECKS

TOTAL ITEMS

TOTAL DEPOSIT 460 00

TOTAL FROM OTHER SIDE

TOTAL

RECEIVED BY

ALL ITEMS ARE RECEIVED FOR THE PURPOSES OF COLLECTION AND ARE SUBJECT TO PROVISIONS OF THE UNIFORM COMMERCIAL CODE WHERE APPLICABLE AND THE RULES AND REGULATIONS OF THIS INSTITUTION. ALL CREDITS FOR ITEMS ARE PROVISIONAL UNTIL COLLECTED.

⑆124000054⑆ [illegible]

[illegible]

[illegible] 6 1 0 3 8 7 0 4 0 0 0 0

DR. THALES H. SMITH 866 P
OR CHARONE SMITH
1400 NORTH 900 EAST 373-83[redacted]
PROVO, UT 84604

3415

[redacted] 19 86 31-2/12[redacted]

Pay to the Order of Utah Governors Club $ 20.00

Twenty and no/100 Dollars

First Interstate Bank
First Interstate Bank of Utah, N.A.
Provo Office
300 West Center Street
Provo, Utah 84601

For Stephen John Thorn Charone Smith

⑆124000025⑆ 41 12796 0⑈ 3415

DR. ROBERT L. MOODY 11-84
PH. 377-3413
2230 N. UNIVERSITY PARKWAY, SUITE 1A
PROVO, UTAH 84601

Advantage

521

10/30 19 86 31-1/1240 184

Pay to the order of Utah Gov. Club $ 20 00

Twenty & no DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
OREM OFFICE
35 NORTH STATE, OREM, UTAH 84057

Memo

⑆124000121⑆184 13650 24⑈ 0521

ROXANNE SHALLENBERGER
550 NORTH 500 EAST 225-7235
OREM, UTAH 84057

781

2084

30 OCT 19 86 31-1/1240

Pay to the order of Governors Club $ 20.00

Twenty Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
OREM OFFICE
35 North State
Orem, Utah 84057

For [redacted]

⑆124000121⑆184 13984 13⑈ 2084

Rocky Mountain Bank Note Rainbow White

ROXANNE SHALLENBERGER
550 NORTH 500 EAST 225-7235
OREM, UTAH 84057

781

2083

30 OCT 19 86 31-1/1240

Pay to the order of Governors Club $ 20.00

Twenty Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
OREM OFFICE
35 North State
Orem, Utah 84057

For dues

⑆124000121⑆184 13984 13⑈ 2083

JOHN B. OR MARSHA L. STEWART
1361 SWINTON LANE 451-010
FARMINGTON, UTAH 84025

Advantage

345

10/29/86

31-1
1240

Pay to the order of North Utah Gov. Club $ 80.00

Eighty and 00/100 Dollars

First Security Bank of Utah NATIONAL ASSOCIATION
KAYSVILLE OFFICE
250 NORTH MAIN
KAYSVILLE, UTAH 84037

For _____

⑆124000012⑆166 11932 17" 3453

J. KEITH HENDERSON 7-85
ATTORNEY AT LAW
CRESTON PLAZA SUITE 210
290 WEST 25TH STREET
OGDEN, UTAH 84401

470

10-29 19 86

31-7053
3240

PAY TO THE ORDER OF Utah Republican Party 40.00

Forty & 00/100 DOLLARS

American Savings
ECCLES BUILDING
Washington and 24th Street Ogden, Utah 84401

FOR _____

⑆324070538⑆470 0103550⑆

MICHAEL L. JONES OR JOY JONES
818 SOUTH SHIRLEY RAE DR. 451-5118
FARMINGTON, UTAH 84025

1181

1814

Oct 29 1986

97-7051/3243

Pay to the order of Republican Party of Utah $ 20.00

Twenty Dollars

UNITED SAVINGS & LOAN ASSOCIATION
Fourth South Office
376 E. Fourth South • Salt Lake City, UT 84111

For _____

⑆324370513⑆321200005864⑈ 1814

North American Bank Note DP-3

THOMAS O. PARKER
ATTORNEY AT LAW
536 EAST 4TH SOUTH 532-7424
SALT LAKE CITY, UTAH 84102

948

10-30 19 86

31-73/1240

982

Pay to the order of Utah Republican Party $ 20.00

Twenty & no/100 Dollars

FOURTH SOUTH FOURTH EAST OFFICE
CSB Commercial Security Bank
SALT LAKE CITY, UTAH 84111

For Q

PAUL ROGERS & ASSOCIATES IN[illegible]
964 EAST 930 NORTH
OREM, UTAH 84057

381

10-28 19 86

97-88/1243 09

PAY TO THE ORDER OF Utah Governors Club $ 20.00

twenty and no/100 DOLLARS

Deseret Bank
OREM OFFICE
140 WEST 800 NORTH
OREM, UTAH 84057

6100

MEMO

Paul Rogers

⑈124300880⑈0381 09025206⑈01

THOMAS O. PARKER
ATTORNEY AT LAW
536 EAST 4TH SOUTH 532-7424
SALT LAKE CITY, UTAH 84102

947

10-29 19 86

31-73/1240

982

Pay to the order of Utah Governors Club $ 40.00

Forty & no/100 Dollars

FOURTH SOUTH FOURTH EAST OFFICE
CSB Commercial Security Bank
SALT LAKE CITY, UTAH 84111

For 2

Thomas O. Parker

⑆124000737⑈0947 560208563⑈

ERNEST F. DURBANO 5-85
P. O. BOX 1556
OGDEN, UTAH 84402

159

10-28 86

31-1/1240 32

Pay to the order of Gov Club $ 40 00

Forty and no/100 DOLLARS

First Security Bank of Utah NATIONAL ASSOCIATION
OGDEN OFFICE
2404 WASHINGTON BLVD., OGDEN, UTAH 84401

Memo Dues

⑆124000012⑈032 22565 46⑈ 0159

DEAN R. OR PATRICIA C. COTTLE 1-81
918 WILSHIRE COURT
FARMINGTON, UTAH 84025

2152

Oct 29 19 86

97-7751 3243

PAY TO THE ORDER OF Utah Governors Club $ 40.00

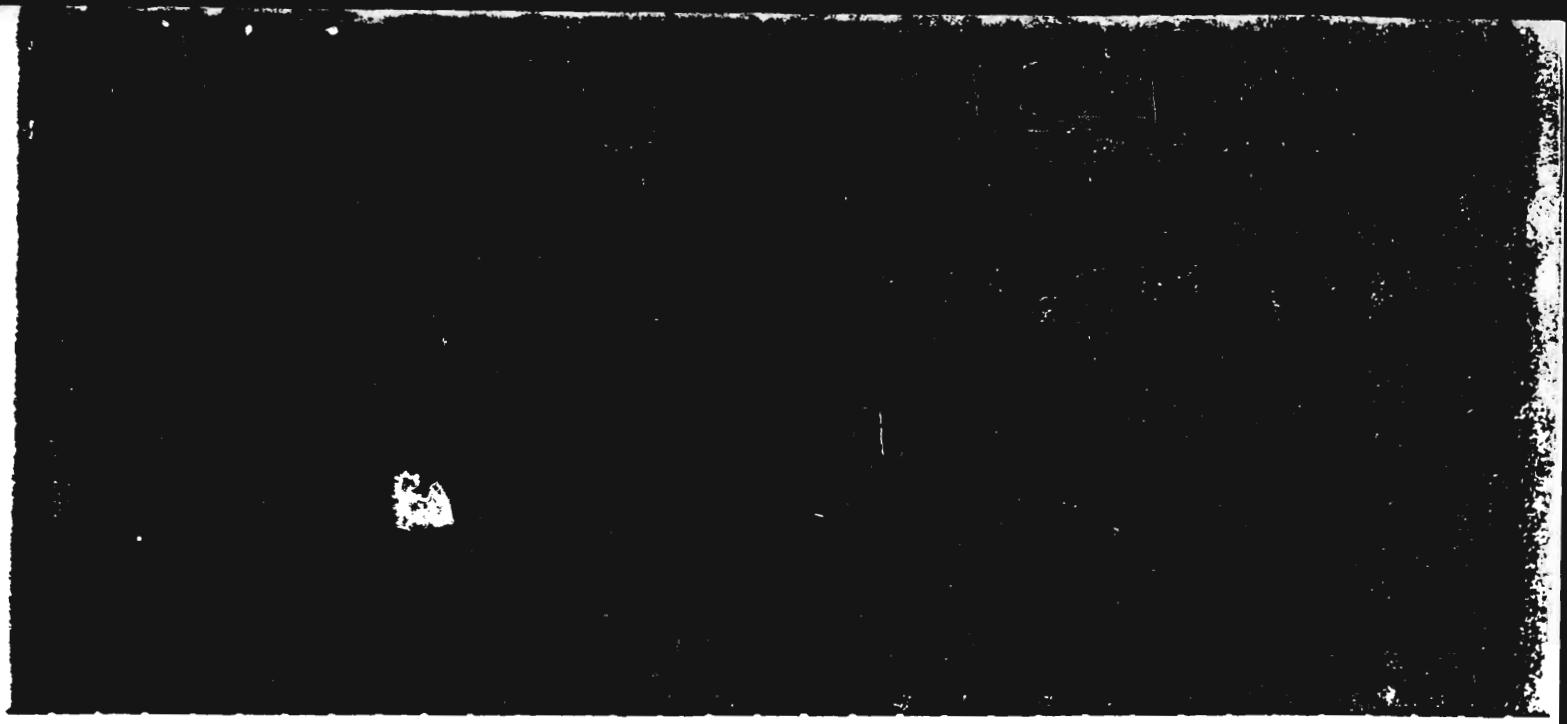
Forty and no/100 DOLLARS

AMERICA FIRST
CREDIT UNION
P.O. BOX 9199 OGDEN, UTAH 84409

MEMO

Dean R. Cottle

⑆324377516⑈7460000816 5⑈ 2152



UTAH EDUCATION ASSOCIATION
POLITICAL ACTION COMMITTEE
875 EAST 5180 SOUTH (801) 266-4461
MURRAY, UTAH 84107

874

№ 2691

UNITED BANK
87-194 1243

EXACTLY
R7854 EXACTLY $40 00 CTS

PAY _____ DATE October 29, 1986 AMOUNT $**40.00

TO THE ORDER OF
Utah Republican Headquarters
643 East 4th South, Suite 2B
Salt Lake City, Utah 84102

"000269" :: 243 194 :: 00034 9"

PETER C. KNUDSON, D.D.S.
ORTHODONTIST
105 EAST SKYLINE DRIVE PHONE (801) 723-6366
BRIGHAM CITY, UTAH 84302

769

7603

FIRST SECURITY BANK OF UTAH
National Association
Brigham City Office
Brigham City, Utah
31-1 1240
26764 30N

PAY Twenty dollars and no/100

DATE 10/29/86 AMOUNT $ 20.00

TO THE ORDER OF
Utah Governor Club

PETER C. KNUDSON, D.D.S.

"007603" :: 240000 26: 039 00393 29"

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
1987 NOV 17 AM 11:04

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #5

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, ("Federal Account") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6)(B)(iv) and 441d(a).*/ On December 10, 1987, the Commission considered the respondents' request for pre-probable cause conciliation, determined that further discovery was warranted, and directed this Office to circulate additional questions for Commission approval. The Commission approved these interrogatories on January 27, 1988, and they were sent to the respondents on February 4, 1988.

The Federal Account requested and received an extension of time to respond until March 15, 1988. On March 21, 1988, this Office received the Federal Account's response which did not provide complete information to the Commission's interrogatories. After being contacted by this Office, the respondents agreed to file a supplemental response.

Subsequently, respondents obtained counsel who conferred with this Office regarding the costs of materials said to be

*/ At the time of this determination, the Commission's policy was that committees exceeding the limitations of 2 U.S.C. § 441a(d) violated that section. The Commission has changed this policy so that committees exceeding the limitations of section 441a(d) are determined to have violated 2 U.S.C. § 441a(f).

0040765024

exempt volunteer activity. Counsel submitted a supplemental response on May 3, 1988. Additionally, on June 6, 1988, this Office received a second request for pre-probable cause conciliation from the Federal Account.

On August 2, 1988, the Commission considered the Federal Account's request for pre-probable cause conciliation and determined not to grant it. Additionally, on August 2, 1988, based on information uncovered during the course of the investigation, the Commission found reason to believe the Utah Republican State Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). Also on this date, the Commission approved interrogatories and a request for production of documents. Following a substitution of the name of the treasurer on the Commission's certification, these materials were mailed to respondents on August 14, 1988.

On August 31, 1988, respondents' counsel met with staff to discuss the scope of the Commission's subpoena. Subsequently, respondents submitted a request for a twenty day extension of time, citing the press of the Labor Day holiday and the need to contact former members of the campaign. Under these circumstances, this Office granted this twenty day extension of time and so notified the Commission.

Following conversations with this Office, on September 28, 1988, respondents submitted a second extension of time request

0040782

until October 27, 1988. In support of this second extension, respondents explained that after an initial review of the books of the state and federal accounts, possible irregularities had come to light regarding the use of state account funds for federal election expenditures. Respondents stated they had hired an accounting firm to audit the two accounts and to identify all federal expenditures made from the non-federal account during the 1986 election cycle. Under these circumstances, the Commission granted this extension request.

On October 31, 1988, respondents submitted a voluminous response in this matter. An initial review appears to indicate significant federal activity had been conducted from the non-federal account. After further review and analysis of this response, this Office will report to the Commission.

11/16/88
Date

Lawrence M. Noble
General Counsel

0004078502

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
88 NOV 22 PM 2:24

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	MUR 2288
	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached for Commission approval is a conciliation agreement signed by Tom Shimizu on behalf of the Shimizu for Congress Committee and K. Helen Oniki, as treasurer. The attached agreement does not contain any changes from the agreement most recently approved by the Commission. Respondents have also provided checks for the amount of the civil penalty.*/ Therefore, this Office recommends that the Commission accept this agreement.

II. RECOMMENDATIONS

1. Accept the attached proposed conciliation agreement.
2. Approve the attached letter.
3. Close the file as to this respondent.

Date 11/22/88

Lawrence M. Noble
General Counsel

Attachments
1. Civil Penalty Checks (2)
2. Conciliation Agreement
3. Proposed Letter

0004078302 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Tom Shimizu for Congress Committee) MUR 2288
and K. Helen Oniki, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 28, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2288:

1. Accept the proposed conciliation agreement, as recommended in the General Counsel's Report signed November 22, 1988.
2. Approve the letter, as recommended in the General Counsel's Report signed November 22, 1988.
3. Close the file as to this respondent.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision. Commissioner McGarry did not cast a vote.

Attest:

11/23/88
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 11-22-88, 2:24
Circulated on 48 hour tally basis: Wed., 11-23-88, 11:00
Deadline for vote: Mon., 11-28-88, 11:00

cmj

0040783028

flm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 1, 1988

K. Helen Oniki, Treasurer
Shimizu for Congress Committee
2977 East 7000 South
Salt Lake City, Utah 84121

RE: MUR 2288
Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer

Dear Ms. Oniki:

On November 28, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer, in settlement of a violation of 2 U.S.C. §§ 434(b)(2) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Committee and you, as treasurer. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

0004078302 9

questions please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

0004078330

2 of 4 945

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

BEFORE THE FEDERAL ELECTION COMMISSION

88 NOV -7 AM 11:12

In the Matter of	)	
	)	MUR 2288
Shimizu for Congress Committee and K. Helen Oniki, as treasurer	)	

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by M. Kay Christensen. The Federal Election Commission ("Commission") found reason to believe that the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(b)(2) and 441a(f).

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

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

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

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

IV. The pertinent facts in this matter are as follows:

1. Respondent, Tom Shimizu for Congress Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, K. Helen Oniki, is the treasurer of the Shimizu for Congress Committee.

0004083631

88 NOV -7 PM 3:43

3. Pursuant to 2 U.S.C. § 434(b)(2)(C), political committees are required to report the total amount of contributions received from political party committees.

4. Pursuant to 2 U.S.C. § 441a(a)(2)(A), multicandidate political committees are limited to contributing $5,000 per election to the authorized committee of a candidate.

5. Pursuant to 2 U.S.C. § 441a(f), political committees are prohibited from accepting contributions exceeding the Act's limitations.

6. Respondents accepted $10,000 in contributions from the National Republican Congressional Committee ("NRCC"), but failed to initially disclose its receipt of these contributions as being from the NRCC on its 1986 October Quarterly Report. Subsequently, on October 21, 1986, Respondents amended this report to report receipt of these contributions, however, Respondents failed to report the proper designations of these contributions. On December 12, 1986, Respondents amended the 1986 October Quarterly Report to correctly report these contributions.

7. Respondents accepted a total of $5,500 in general election contributions from the Utah Republican Party (Federal Account), but failed to disclose its receipt of $500 of these contributions as being from the Utah Republican Party (Federal Account).

V. 1. Respondents failed to disclose the receipt of $10,000 in contributions from the National Republican Congressional Committee in violation of 2 U.S.C. § 434(b)(2).

0040784332

2. Respondents failed to disclose the receipt of a $500 general election contribution from the Utah Republican Party (Federal Account) in violation of 2 U.S.C. § 434(b)(2).

3. Respondents accepted a $500 excessive general election contribution from the Utah Republican Party (Federal Account) in violation of 2 U.S.C. § 441a(f).

4. Respondents contend said violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one hundred and seventy-five dollars ($175), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

0040783

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

12/1/88
Date

FOR THE RESPONDENTS:

M. Tom Shimizu

K. Helen Oniki
K. Helen Oniki
Treasurer
Shimizu for Congress Committee

Oct. 28, 1988
Date

0004276534

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 APR 14 PM 3:50

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE
EXECUTIVE SESSION
MAY 02 1989

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288
	)	
	)	
	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 10, 1987, the Commission found reason to believe the Utah Republican Party (Federal Account) and R. Todd Neilson, as treasurer, violated 2 U.S.C. §§ 441a(d),[1/] 441a, 434(b)(6)(B)(iv) and 441d(a). Underlying the Commission's determination was evidence that the respondents paid for a number of mailers and radio ads on behalf of 1986 Congressional candidate Tom Shimizu, the costs of which exceeded the Act's limitations at 2 U.S.C. § 441a. Additionally, it appeared the respondents had failed to include the costs of these mailers and radio ads on its reports, and had failed to include appropriate disclaimers on them.

On December 10, 1987, the Commission considered the respondents' request for pre-probable cause conciliation, determined that further discovery was warranted, and directed this Office to send further questions to the respondents.

1/ The Commission now finds excessive section 441a(d) spending to be violative of 2 U.S.C. § 441a(f).

9004078035

Following an extension of time, the Federal Account submitted an initial incomplete response. After obtaining counsel who conferred with this Office, on May 3, 1988, respondents submitted a supplemental response. On June 6, 1988, respondents made a second request for pre-probable cause conciliation.

On August 2, 1988, the Commission considered the Federal Account's request for pre-probable cause conciliation and determined not to grant it at that time. Additionally, on August 2, 1988, based on information uncovered during the course of the investigation, the Commission found reason to believe the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1).2/ Also on that date, the Commission approved a subpoena and order which were mailed to respondents on August 14, 1988.

Following an August 31, 1988 meeting with staff of this Office, respondent's counsel requested and received an extension of time to respond. On September 28, 1988, respondents submitted a second request for an extension of time, explaining that an initial review of books and records had uncovered irregularities and that it had hired an accounting firm to audit the Non-Federal and Federal Accounts. The Commission granted this request on

2/ This report also refers to the respondents as "the Federal Account" and the "Non-Federal Account."

0004078336

October 14, 1988 and a complete response was submitted on October 29, 1988.

This report first addresses issues arising in the context of section 441a(d). Second, it discusses the respondents' use of impermissible funds. Third, it addresses the disclaimers placed upon certain materials. Last, it recommends the Commission now agree to the respondents' request for pre-probable cause conciliation.

II. SPENDING SUBJECT TO THE LIMITATIONS OF 2 U.S.C. § 441a(d)

A. Coordinated Party Expenditures - Additional Mailers

On March 10, 1987, the Commission found reason to believe the Federal Account violated 2 U.S.C. §§ 441a and 441a(d). Underlying the Commission's determination were two mailers ("You Can Tell" and "This Is The Door") and two radio ads that were alleged to be coordinated party expenditures on behalf of the Shimizu Committee.[3/] See General Counsel's Report signed February 20, 1987. Additionally, information uncovered during the course of the Commission's investigation revealed a third mailer entitled "Garn-Shimizu Letter" that also appeared to be a section 441a(d) expenditure. See General Counsel's Report signed July 20, 1988 at pp. 2-4. As discussed below, the Federal Account's most recent response includes another mailer advocating the election of Senator Garn and candidate Shimizu that also

3/ The Commission found reason to believe the Shimizu Committee and K. Helen Oniki, as treasurer, violated 2 U.S.C. §§ 434(b)(2) and 441a(f). On November 28, 1988, the Commission accepted a signed conciliation agreement submitted on behalf of the Shimizu Committee and closed the file as to these respondents.

0004078337

appears to be a coordinated party expenditure.

The mailer is entitled "One Plus One." It was mailed shortly before the November 4, 1986 general election and includes pictures of Senator Garn and Tom Shimizu. It states that "SENATOR JAKE GARN + TOM SHIMIZU = TWO STRONG VOTES FOR UTAH," and concludes "A VOTE FOR TOM SHIMIZU IS A VOTE FOR JAKE GARN, TOO. ON NOVEMBER 4TH, VOTE GARN & SHIMIZU."

Pursuant to 2 U.S.C. § 44la(d), (and as adjusted by the Consumer Price Index), state party committees are permitted to make general election expenditures on behalf of a candidate. The 1986 limitation for each of the three House races in Utah was $21,810. An expenditure is subject to section 44la(d) if it is for the general election, notes a clearly identified candidate and contains an electioneering message. See Advisory Opinions 1984-15 and 1985-14. An electioneering message includes both messages designed to urge the public to elect a certain candidate or party and messages containing express advocacy.

The One Plus One mailer meets the standard for a section 44la(d) expenditure. The communication identifies general election candidates and explicitly advocates votes in that election. Tom Shimizu is clearly identified as a candidate by name and his picture appears. The mailer's message for voters to "Vote Garn and Shimizu" constitutes express advocacy, and is, therefore, an electioneering message.

0004078038

It is the opinion of this Office that the costs of the Garn-Shimizu Letter and the One Plus One Mailer should be allocated one half to Tom Shimizu and one half to Senator Garn. As discussed further at Section II. D., respondents had assigned their ability to make coordinated party expenditures on behalf of Tom Shimizu to the National Republican Congressional Committee ("NRCC"). Consequently, respondents were precluded from making any expenditures on his behalf. Therefore, the amounts spent on behalf of Tom Shimizu are included with the State Party's excessive section 441a(d) spending listed in Section II.D. It appears neither the National Republican Senatorial Committee ("NRSC") nor the respondents came close to spending their respective $44,972.22 section 441a(d) limit on behalf of the 1986 Utah Senate race.4/ Thus, the costs of these mailers allocated to the Garn Committee are not included with the listing of excessives, but are included with violations regarding the respondents' failure to report section 441a(d) spending.

The Federal Account's most recent response also identifies a fifth mailer that appears to be a section 441a(d) expenditure advocating the election of First Congressional District Republican candidate Jim Hansen. The mailing, sent in October 1986, is included at Attachment 1, pages 18-22 and is entitled "Is There Really A Difference?" It juxtaposes the records of

4/ Respondents made only a $500 general election contribution to the Garn Committee and did not report any coordinated party spending for this race. The NRSC spent $1,234 of its section 441a(d) limit for the 1986 Utah Senate race.

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Candidate Hansen with Democrat Gunn McKay and specifically notes the November 4th election date. Republican nominee Jim Hansen is clearly identified by name. Additionally, the ad contains an electioneering message in that Jim Hansen is positively linked with "President Reagan, Vice-President Bush, ... and the others who have been helping solve America's problems" while Gunn McKay's influence is negatively referred to as "limited to the Democrats in the House - the liberal, out-of-touch obstructionists who are part of America's problem in Washington." (emphasis in original). Moreover, an electioneering message is also present in that the mailer expressly exhorts "Vote Jim Hansen on November 4th."

Respondents did not report the cost of the "Is There Really A Difference?" mailer as a section 441a(d) expenditure on behalf of candidate Hansen and have not addressed the section 441a(d) issue as applied to this mailing. Nevertheless, it appears to meet the criteria for a section 441a(d) expenditure as discussed above. Moreover, because the NRCC reported spending $40,000 in coordinated party expenditures for Mr. Hansen's candidacy, it appears the respondents also assigned to the NRCC their section 441a(d) limit for this race and thus were precluded from making such expenditures. Additionally, the mailer cannot be considered an in-kind contribution because respondents made the maximum permitted contribution to this election to the Hansen Committee. Accordingly, the payment for this mailer is included in the calculation of respondents' excessive section 441a(d) spending.

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The applicability of the volunteer exemption to these mailings is discussed below.

B. Coordinated Party Expenditures - Volunteer Exemption

1. The Law

The Federal Account asserts that the four Shimizu mailers are exempt volunteer activity under 2 U.S.C. § 431(9)(B)(viii). This section excludes from the definition of an expenditure payments by a state party of the costs of certain campaign materials used by such committee in connection with volunteer activities on behalf of its nominees, provided the payments are not for costs in connection with broadcasting, direct mail, or similar types of general public communication or political advertising. Additionally, the payments for such materials must be made with permissible funds and cannot be made from contributions designated to be spent on behalf of a particular candidate. Id. The Commission's Regulations define "direct mail" to mean mailings by a commercial vendor or mailings made from a commercial list. 11 C.F.R. § 100.8(b)(16). Additionally, the Regulations require that volunteers, and not commercial or for profit operations, distribute the materials. Id. Payments by the party organization for travel and subsistence or customary token payments to volunteers do not remove such individuals from the volunteer category. Id.

The legislative history of this exemption states that its purpose was to encourage volunteers to work for and with local

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and state political party organizations. H.R. Rep. No. 422, 96th Cong., 1st Sess. at 9 (1979), reprinted in FEC, Legislative History of Federal Election Campaign Act Amendments of 1979, at 193 (GPO 1983) (hereinafter "Legislative History"). The legislative history specifies that the test for determining volunteer activity is two fold - how the campaign materials are used and by whom. It stresses that the exemption excludes all general public communications or political advertising. Moreover, specific types of campaign materials are not automatically within the exemption. Rather, the role of volunteers using these materials must be examined. Because the purpose of this exemption is to encourage volunteer participation, "distribution by commercial or for-profit operations is not exempted." Id.

2. The Facts

The Federal Account asserts that the mailers are within the volunteer exemption, noting it used its own mailing list compiled from a list of all registered voters, and that the mailings were conducted "with substantial and active involvement by volunteers." Federal Account's April 17, 1987 Response at 1. Although respondents initially made this statement about only the mailers noted in the complaint, the This Is the Door and You Can Tell mailers, they now argue all four Shimizu mailers are exempt volunteer activity. Through repeated questioning respondents have stated that 240 volunteers participated in the mailings. As discussed below, however, the extent of this volunteer

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activity was very limited.

The initial responses stated that the role of the volunteers in this mailing was to stamp on the non-profit mail seal. The most recent response avers that volunteers picked up the mailers from the printers and stamped each mailer. The volunteers then "manually bundled and boxed [the mailers and] . . . then transported the mailers by motor vehicle to Progressive Direct Mail," the direct mail firm used by respondents. October 29, 1988 Response at 9. This direct mail firm prepared the labels from mailing lists owned by the respondents. Id. Progressive Direct Mail then "labelled and sorted for bulk mail handling all of the mailers." Id. This firm then transported these mailers to the post office.

The One Plus One mailer involved a total of 30,526 pieces. October 27, 1988 Interrogatory Response at Exhibit B. The This Is the Door mailer involved 77,221 mailers. Id. at 6. Respondents assert 118,933 copies of the You Can Tell mailer were mailed. Id. at 7. Additionally, 29,901 copies of the Garn-Shimizu letter were mailed. Id. at Exhibit B. Therefore, the total number of pieces mailed by Progressive Direct Mail in connection with these four mailers was 256,581.

3. Application of Law to the Facts

It is the opinion of the Office of the General Counsel that respondents' mass mailings are "direct mail," under 2 U.S.C. § 431(9)(B)(viii)(I) and thus specifically outside the volunteer exemption. As illustrated above, after the materials were

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printed by a commercial printer and stamped by the volunteers, Progressive Direct Mail took over. This firm prepared the more than 250,000 address labels, attached the labels to all the mailers, sorted the mailers for bulk mailing and mailed them. Thus, these mailers were "distribut[ed] by [a] commercial or for-profit operation[]," Legislative History at 197, and constitute "mailings by a commercial vendor," squarely within the Regulations' definition of direct mail at 11 C.F.R. § 100.8(b)(16)(i).

Moreover, even if the mailings could be considered not to be direct mail, they are outside the scope of the volunteer exemption for another fundamental reason: the insufficiency of the purported volunteer activity. In light of the commercial activities conducted by the printer and Progressive Direct Mail, the volunteers' role was miniscule. Indeed, the only activity conducted by the volunteers was to stamp the non-profit mail seal on each mailer, bundle them, and deliver the mailers to the direct mail firm. Despite detailed questioning by this Office, respondents have not shown any other significant volunteer functions, and it appears no other volunteer activity was conducted. Respondents thus essentially argue that the touching of each mailer by an individual volunteer transforms an otherwise commercial operation into exempt activity. This is squarely at odds with the legislative intent envisioning significant volunteer participation.

It is the position of this Office that the mere stamping of mail seals on these documents and the mere presence of volunteers

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cannot convert an essentially commercial operation into the type of exempt activity envisioned by the Act, Regulations and legislative history. In sum, the commercial nature of this operation coupled with the absence of requisite volunteer involvement places the disbursements for the mailings outside the volunteer exemption. For this reason as well, the costs associated with these mailings are outside the Act's exemption to the definition of an expenditure.5/

C. Coordinated Party Spending - Radio Ads

The Commission's reason to believe findings also encompassed two radio ads paid for by the Federal Account. Respondents argue that neither of the radio ads are section 441a(d) expenditures. According to respondents, one of the ads was aired prior to the August 1986 primary election and hence purportedly was not for the general election. Additionally, respondents dispute that both of the radio ads contained an electioneering message.6/

The first radio ad, referred to as "the Anti-Owens Ad" in the First General Counsel's Report, aired in July 1986. This ad

5/ As noted supra, page 6, respondents have not addressed the applicability of section 441a(d) to the "Is There A Difference?" mailer. Nevertheless, because these mailers were produced at the same time as the Shimizu mailers, used the same vendors, and received the same services from Progressive Direct Mail, to the extent respondents would argue that the mailers are within the volunteer exemption, this argument would be without merit.

6/ The Commission considered the recommendations encompassing the radio ads at its December 10, 1987 meeting. Because the Commission determined not to enter into pre-probable cause conciliation with respondents on that date, respondents' arguments regarding the radio ads in their April 17, 1987 response dated are again presented for Commission consideration.

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discussed the acknowledged Democratic nominee Wayne Owens who later opposed Republican Tom Shimizu in the general election. The transcript of this ad reads:

Narrator:	"A little democrat strategy."
1st person:	"Now its gotta be a slogan people will believe."
2nd person:	"O.K. how 'bout this, Wayne Owens stands up to liberals in Washington."
1st person:	"Now that didn't work last time."
2nd person:	"O.K., Owens is not like Kennedy and O'Neill."
1st person:	"That's crazy, they trained Owens."
2nd person:	"Alright, how 'bout this, Wayne Owens - fiscal conservative!"
Both:	Loud Laughter
Narrator:	"Why has Wayne Owens spent $50,000 on T.V. to convince Utah voters that he's a fiscal conservative, - Wayne you've got some explaining to do!"
	"Paid for by the Utah Republican Party."

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In October, 1986, respondents also paid for the following ad, referred to as the "Village Voice Ad" in the First General Counsel's Report:

Narrator:	WOULD YOU BELIEVE THAT A NEW YORK CITY NEWSPAPER SAYS UTAH IS ONE OF THE BEST PLACE FOR LIBERALS TO INVEST THEIR POLITICAL CONTRIBUTIONS? A RECENT ARTICLE ENTITLED "AN INVESTMENT GUIDE FOR LIBERALS" CALLS WAYNE OWENS ONE OF THIS YEAR'S BEST INVESTMENTS FOR PEOPLE WHO WANT TO ELECT LIBERALS TO CONGRESS. THEY SAY THAT OWENS WORKED FOR TED KENNEDY AND THAT HE'LL FIGHT AGAINST THE PROGRAMS OF PRESIDENT REAGAN. BUT WAYNE

**OWENS TELLS UTAHANS HE'S A CONSERVATIVE.
WAYNE, YOU'VE GOT SOME EXPLAINING TO DO.**

PAID FOR BY THE UTAH REPUBLICAN PARTY.

In support of their argument that the Anti-Owens Radio Ad was not for the general election, respondents assert that the Anti-Owens Ad was aired when the Republican party had two candidates seeking the nomination and at a time when "the opposition had placed major television buys in our market." April 17, 1987 Response at 1. Respondents' argument that this radio ad could not be a section 441a(d) expenditure because it was aired before the party's nomination of a candidate must fail, because the Commission has interpreted section 441a(d) to reach general election related expenditures made before formal nomination. Advisory Opinion 1984-15; see also MUR 2186 and FEC v. National Conservative Political Action Committee, 647 F. Supp. 987 (S.D.N.Y. 1986). Here, the response to the complaint noted that the Utah Republican Party apparently considered Mr. Owens to be his party's nominee prior to the primary election. See First General Counsel's Report at 7. Moreover, contrary to respondents' assertion, the Commission has not required the expending party to be certain of its own nominee. It is only necessary that the expenditures benefit the person eventually nominated by that party. See Advisory Opinion 1984-15 and MUR 2186. Therefore, because Mr. Owens was clearly identified in the ads and was considered to be his party's nominee, these ads have met two of the requirements for a section 441a(d) expenditure. See p. 4, supra.

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Respondents also assert that the other requirement for a section 441a(d) expenditure - an electioneering message - is not present in the ads. In discussing both radio ads, respondents state that the ads were an effort "to educate the public concerning this non-incumbent candidate for congress . . . and allowed the public to become better informed on the issues." April 17, 1987 Response at 1. Whether or not the Federal Account's assertion that it aired these ads with the purpose of "educating" voters is persuasive, the ads contained electioneering messages as well. The Anti-Owens Ad refers satirically to "democrat strategy" and noted that Wayne Owens, the Democratic candidate, was spending $50,000 on television advertising to convince Utah voters of something suggested to be untrue. Similarly, the second ad informs listeners that the candidate was lying to the people of Utah about his status as an alleged conservative, thus leading to the conclusion that voters should not vote for him. The ads refer to elections, voters, campaign contributions and campaign strategy. Thus, the content of both ads inescapably reflects respondents' design to create a negative impression of the candidate in order to lessen the candidate's electoral support. This is the essence of an electioneering message. Thus, both ads are subject to section 441a(d).

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D. SUMMARY OF SECTION 441a(d) SPENDING

It is the position of the Office of the General Counsel that respondents have exceeded their limitation at 2 U.S.C. § 441a(d).

As previously noted, the coordinated party expenditure limitation for 1986 Utah House races was $21,810. Respondents admit that they assigned their ability to make such expenditures on behalf of Tom Shimizu to the NRCC and it appears a similar assignment was made regarding the Hansen Committee. Hence, respondents were precluded from making any coordinated party expenditures. Moreover, respondents directly contributed the maximum possible general election contribution to the Hansen Committee and more than the maximum contribution to the Shimizu Committee.[7] The section 441a(d) expenditures made by respondents in connection with these elections are listed below.[8]

Spending	Cost*		$ 441a(d) Expenditure
Garn-Shimizu 1+1 Letter	Printing:	$2,980.00	
	Labeling:	205.26	
	Postage:	2,167.35	$ 2,676.30**
Garn-Shimizu Letter	Printing:	$2,343.00	
	Labeling:	299.01	
	Postage:	2,122.97	$ 2,382.49**
This Is The Door mailer	Printing:	$4,655.50	
	Labeling:	722.11	
	Postage:	5,489.09	$10,866.70

7/ Respondents made a total of $5,500 in general election contributions to the Shimizu Committee. An admission of this violation is included in the attached proposed conciliation agreement.

8/ The most recent response in this matter resolves a number of factual discrepancies noted in the General Counsel's Report signed July 20, 1988. For example, respondents had stated two different amounts as the cost of the Village Voice radio ad; the latest response clarifies the cost. Additionally, this sworn response resolves factual questions raised regarding the number and cost of the You Can Tell and This is the Door mailers that were printed and mailed.

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Spending	Cost*		Expenditure
You Can Tell mailer	Printing:	$2,880.00	
		4,655.50	
	Labeling:	1,214.33	
	Postage:	8,444.37	$17,194.20
Anti-Owens Ad			$ 5,337.45
Village Voice Ad			$ 5,232.90
Is There A Difference? mailer	Artwork:	356.00	
	Printing:	3,242.00	
	Labeling:	434.84	
	Postage:	4,161.87	$ 8,194.71
		Total	= $51,884.75

* Figures provided by Peat-Marwick and exclude sales tax. Utah sales tax on the services other than postage is 6.25%.

** One-half allocated to Garn; one-half allocated to Shimizu. Figure only includes the latter.

As previously discussed, respondents' spending constitutes expenditures subject to the limitation of 2 U.S.C. § 441a(d) made at a time when respondents were without authority to spend under that section. Moreover, respondents failed to report these expenditures as itemized section 441a(d) spending as required by 2 U.S.C. § 434(b)(6)(B)(iv). Accordingly, respondents impermissibly spent over $50,000 on coordinated party spending and failed to properly report this spending. Therefore, the attached conciliation agreement includes admissions of violations of 2 U.S.C. §§ 434(b)(6)(B)(iv) and 441a(f).

II. USE OF IMPERMISSIBLE FUNDS

On August 2, 1988, the Commission found reason to believe the respondents violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). Underlying this determination was information

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that respondents had made federal election disbursements from the Non-Federal Account.9/ The respondents have conducted an internal audit of their Federal and Non-Federal Accounts, and have identified many disbursements for federal elections that were paid from the respondents' Non-Federal Account. Payments made from the Non-Federal Account include costs for labeling and postage costs for all of the section 441a(d) spending previously discussed, as well as the payment for the Village Voice radio ad. Additionally, the entire cost of the "Is There A Difference?" mailer was paid from the Non-Federal Account. The total amount of impermissible funds used was $102,825.20. This spending occurred between July 1, 1986 and December 31, 1986. The amounts composing this total are listed at Exhibit 5 to respondents' most recent response. Of this total, respondents claim that $50,215.61 was reimbursed by federal political committees on whose behalf the disbursements were made.10/ The dates of these reimbursements were not provided.

Pursuant to 11 C.F.R. § 102.5(a), political committees conducting both state and federal activity must either accept only funds subject to the Act's prohibitions and limitations or

9/ The July 22, 1988 General Counsel's Report also noted that respondents appeared to have provided two different amounts for the expenditures made from this account. Their most recent response clarifies this amount, explaining that an illegible check copy had been misread. October 27, 1988 Response at 3.

10/ These partial subsequent reimbursements by federal political committees to the Non-Federal Account do not obviate the fact that funds from the Non-Federal Account were used for the purpose of influencing federal elections.

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establish a separate federal account that accepts only permissible funds. The Act establishes contribution limitations on individuals, 2 U.S.C. § 441a(a)(1)(A), and prohibits contributions from corporations and labor unions. 2 U.S.C. § 441b(a). Political committees are prohibited from accepting such corporate and union contributions. Id. Committees establishing a separate federal account must make all disbursements, contributions, expenditures, and transfers in connection with any federal election from the federal account. 11 C.F.R. § 102.5(a)(1)(i).

Respondents admit that funds from the Non-Federal Account were used for the purpose of influencing federal elections. According to the checks provided by the respondents in response to a request for a FIFO analysis, these amounts appear to include funds prohibited under the Act.11/ Therefore, there is additional evidence supporting the Commission's earlier determination that there is reason to believe respondents violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1).

III. DISCLAIMER ISSUE

On March 10, 1987, the Commission found reason to believe

11/ E.g., this response includes copies of checks from Cook Associates, Inc. ($686.27, $1,262.10, $54.67 and $11,119.88); Harding & Associates, P.C. ($1,020), as well as many others. Respondents note the Non-Federal Account also contained $60,000 from the National Republican Senatorial Committee that was said to have been intended for the Federal Account. Because, however, this check bears the imprint of the NRSC's corporate escrow account, it is questionable whether this amount was composed of permissible funds. See Attachment 1, pages 11 and 23.

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include a full disclaimer in the two radio ads and on two mailings by omitting the required authorization statement.12/ The respondents do not dispute the Commission's determination, but request that the Commission take no further action as to these violations "because there can be no question by the public as to who paid for the mass mailings and radio advertisements." April 17, 1987 Response at 2.

Pursuant to 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11, whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through any broadcasting station, direct mailing or any other form of general public political advertising, a disclaimer must be included. Such disclaimer must state who paid for the communication and whether or not it was authorized by the candidate.

In the instant case, all five mailers contain express advocacy.13/ Additionally, as previously discussed at Section II.B., the mailers in question are direct mail; therefore, section 441d(a) requires that a complete disclaimer be placed on

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12/ The other three mailings discovered since the Commission's original reason to believe finding, the Garn-Shimizu letter, the One Plus One mailer and the "Is There A Difference?" mailer, also omit the required authorization statement.

13/ Both the This Is The Door and You Can Tell mailers contain the phrases, "Tom Shimizu for Congress, on November 4th, Vote To Keep The Dream Alive." The Garn-Shimizu mailer includes a picture of candidate Tom Shimizu and urges, "Help us by Voting for Tom [Shimizu] on November 4th." The One Plus One mailer urges "ON NOVEMBER 4TH VOTE GARN & SHIMIZU." The Is There A Difference? mailer exhorts, "Vote Jim Hansen On November 4th".

them. Compare AO 1988-40, 1 Fed. Election Camp. Fin. Guide [CCH] ¶5938 at p. 11,494. Similarly, both radio ads also contain express advocacy.14/ As broadcast communications, they require disclaimers. Because the mailers and radio ads do not contain authorization statements as part of their disclaimers, this Office has included these violations in the attached, proposed conciliation agreement.

IV. OUTSTANDING REQUEST FOR PRE-PROBABLE CAUSE CONCILIATION

The respondents also have an outstanding request for conciliation prior to a finding of probable cause to believe. In light of the most recent response, this Office recommends that the Commission grant this request.

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V. **RECOMMENDATIONS**

1. Enter into conciliation prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer.

2. Approve the attached letter and conciliation agreement.

Date 4/14/89

Lawrence M. Noble
General Counsel

Attachments
1. October 28, 1988 Response (without attachments or exhibits except for internal audit report, two mailers, and NRSC check from Exhibit J)
2. Proposed letter
3. Proposed conciliation agreement

Staff Assigned: Patty Reilly

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN
COMMISSION SECRETARY

DATE: APRIL 19, 1989

SUBJECT: OBJECTIONS TO MUR 2288 - General Counsel's Report Signed April 14, 1989

The above-captioned document was circulated to the Commission on Monday, April 17, 1989 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	X
Commissioner Elliott	X
Commissioner Josefiak	X
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for May 2, 1989.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of May 16, 1989, do hereby certify that the Commission took the following actions in MUR 2288:

1. Failed on a vote of 3-3 to pass a motion to -

   a) Enter into conciliation prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer.

   b) Approve the letter and conciliation agreement attached to the General Counsel's report dated April 14, 1989, subject to the following amendments to the agreement:

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Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion; Commissioners Aikens, Elliott, and Josefiak dissented.

2. Decided by a vote of 4-2 to -

a) Enter into conciliation prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer.

b) Approve the letter and conciliation agreement attached to the General Counsel's report dated April 14, 1989, subject to the following amendments to the agreement:

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

Attest:

May 17, 1989
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1989

H. Dickson Burton, Esquire
Watkiss & Campbell, P.C.
310 South Main Street
Salt Lake City, Utah 84101-2171

Re: MUR 2288
Utah Republican Party
(Federal/Non-Federal Account)
and Michael L. Jones, as
treasurer

Dear Mr. Burton:

On March 10, 1987, the Federal Election Commission found reason to believe that Utah Republican Party (Federal/Non-Federal Account) and its treasurer, violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6)(B)(iv) and 441d(a). Additionally, on August 2, 1988, the Commission found reason to believe your clients violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). The Commission acknowledges the receipt of your response to its interrogatories and request for production of documents.

At your request, on May 16, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. Please note that the conciliation agreement clarifies that the State Party's section 441a(d) expenditures were in violation of 2 U.S.C. § 441a(f). This agreement also includes an admission of a violation regarding an excessive contribution made by your clients to the Shimizu Committee.

If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with

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a mutually satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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OOC 3021

FEDERAL ELECTION COMMISSION
AUDIT ADMINISTRATIVE DIVISION

89 JUN 12 PM 12:22

LAW OFFICES

WATKISS & CAMPBELL

A PROFESSIONAL CORPORATION

TWELFTH FLOOR

310 SOUTH MAIN STREET

SALT LAKE CITY, UTAH 84101-2171

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WRITER'S DIRECT NUMBER:

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ROBERT D. MAACK
MICHAEL F. HEYREND
GREGORY B. MONSON
ALLAN T. BRINKERHOFF
WESTON L. HARRIS
E. BARNEY GESAS
LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
D. RANDALL TRUEBLOOD
VINCENT C. RAMPTON
JOSEPH T. DUNBECK, JR.
TRACY H. FOWLER

R. L. KNUTH
DENNIS J. CONROY
STEVEN T. WATERMAN
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PERRIN R. LOVE**
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MATTHEW C. BARNECK
STEVEN W. CALL

OF COUNSEL
ZAR E. HAYES

*ADMITTED IN TEXAS ONLY
**ADMITTED IN WASHINGTON, D.C. ONLY

June 6, 1989

CONFIDENTIAL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 13 AM 9:22

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2288
Utah Republican Party Matter

Dear Mr. Noble:

Thank you for your letter addressed to H. Dickson Burton of this office dated May 26, 1989. As General Counsel to the Utah Republican Party, I am the responsible individual to whom formal correspondence from the FEC should be addressed. It would be helpful if that were noted and followed by your Commission in further communication and correspondence.

You are advised that the subject matter of your letter and the attached draft of Conciliation Agreement are under review and analysis by the leaders of the Utah Republican Party and its counsel. We will be in contact with you by telephone but also to respond formally to your letter within the time frame of 30 days from May 26.

I will look to communicating and talking with you further on the matter within the next 20 days. Thank you for your attention.

Sincerely yours,

Robert S. Campbell Jr.

ROBERT S. CAMPBELL, JR.
General Counsel
Utah State Republican Party

RSC/dd

FEDERAL ELECTION COMMISSION
SECRETARIAT
89 JUN 20 PM 4:26

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2288
Utah Republican Party (Federal Account/Non-Federal Account and Michael L. Jones, as treasurer	)	SENSITIVE

GENERAL COUNSEL'S REPORT

On May 16, 1988, the Commission determined to enter into conciliation prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer. A letter notifying respondents of this determination and a revised conciliation agreement were mailed on May 26, 1988.

Conciliation negotiations have commenced and to date have been productive. Accordingly, this Office will continue conciliation negotiations for an additional thirty days and report to the Commission at the expiration of that period.

6/20/89
Date

Lawrence M. Noble
General Counsel

Staff Person: Patty Reilly

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MAIL ROOM
89 DEC 29 AM 10: 14

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WATKISS & SAPERSTEIN
A PROFESSIONAL CORPORATION
TWELFTH FLOOR
310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

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TRACY H. FOWLER
R. L. KNUTH
STEVEN T. WATERMAN
KEN P. JONES
DEBRA J. MOORE
CASS C. BUTLER
STUART W. HINCKLEY
PERRIN R. LOVE
H. DICKSON BURTON
DANIEL J. TORKELSON
CHARLOTTE L. MILLER
STEVEN E. McCOWIN
CAROLYN COX
C. SCOTT BROWN
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STEVEN W. CALL
JON C. MARTINSON
MARY J. WOODHEAD
PAUL A. HOFFMAN

OF COUNSEL
ZAR E. HAYES
JAMES R. COWLEY

TELEPHONE
(801) 363-3300

TELECOPIER
(801) 350-3692

WRITER'S DIRECT NUMBER:

December 27, 1989

CONFIDENTIAL

VIA FEDERAL EXPRESS

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

Re: Utah Republican Party, FEC Investigation - MUR 2288

Dear Patty:

Enclosed please find an executed original Conciliation Agreement, a balance sheet for the Utah Republican Party as of November 30, 1988, reflecting both cash on hand and debt for both the non-Federal and Federal accounts, and a check in the amount of $10,000.00 to cover the proposed fine. I am sure you will not be disappointed that the Party is paying the proposed fine in one payment. In addition, I am enclosing a letter to Lawrence Noble which I request be placed in the public record along with the other designated documents.

I understand that I will be hearing from you as soon as the Commission approves the Conciliation Agreement. I would also appreciate knowing which documents are designated for the public record.

If you have any questions or concerns, please let me know.

Very truly yours,

H. Dickson Burton

HDB/mhj
Encls.

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UTAH REPUBLICAN PARTY
BALANCE SHEET
NOVEMBER 30, 1989

ASSETS	
CURRENT ASSETS	
CASH - STATE ACCOUNT	**2,222**
CASH - FEDERAL ACCOUNT	**8,406**
TOTAL CURRENT ASSETS	**10,628**
FIXED ASSETS	
OFFICE FURNITURE & EQUIPMENT	**29,160**
ACCUMULATED DEPRECIATION	**20,702**
	8,458
TOTAL ASSETS	19,086
LIABILITIES	
CURRENT LIABILITIES	
ACCOUNTS PAYABLE*	10,097
PAYROLL PAYABLE	2,727
TOTAL LIABILITIES	12,824
FUND BALANCE	6,262
TOTAL LIABILITIES & FUND BALANCE	19,086

Note: The above figures do not include any fine to the FEC or attorney's fees for working with the FEC.

* These are state account liabilities. The Federal account has no current liabilities.

LAW OFFICES
WATKISS & SAPERSTEIN
A PROFESSIONAL CORPORATION
TWELFTH FLOOR
310 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84101-2171

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GREGORY B. MONSON
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LANGDON T. OWEN, JR.
DAVID B. WATKISS
KAREN C. JENSON
ELIZABETH T. DUNNING
VERNON L. HOPKINSON
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(801) 363-3300

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(801) 350-3882

WRITER'S DIRECT NUMBER:

FEDERAL ELECTION COMMISSION
89 DEC 29 AM 10:14

December 26, 1989

Lawrence Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2288 - Utah Republican Party (Federal Account/Non-Federal Account) Michael Jones as Treasurer

Dear Mr. Noble:

My clients, the Utah Republican Party and Michael L. Jones, hereby request that this letter be placed in the public record with the negotiated Conciliation Agreement and other documents designated for the public record.

As part of the Conciliation Agreement, the Utah Republican Party and Michael L. Jones ("Respondents") contend in sub-paragraph 16 that at the time expenditures discussed in sub-paragraphs 10-15 were made, they believed such expenditures constituted exempt volunteer activity or exempt party building activity. Respondents wish the public record to reflect that they continue to believe that sufficient voluntary activity was involved to exempt the expenditures from the requirements of 2 U.S.C. § 441a, pursuant to 11 C.F.R. § 101.8(b)(16). It was upon further investigations by the Party after this proceeding was initiated that the Party discovered the expenditures were inadvertently paid out of the non-Federal account, thus disqualifying the expenditures as non-allocable pursuant to 11 C.F.R. § 101.8(b)(16). It is because these expenditures were made out of the non-Federal account that the Utah Republican Party and Michael L. Jones, as Treasurer, determined that it was in their best interest to enter into Conciliation

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regarding these expenditures. It continues to be Respondents' position that the volunteer activities were otherwise sufficient under the cited regulation to exempt the expenditures from the requirements of 2 U.S.C. § 441(a).

Very truly yours,

H. Dickson Burton
Counsel for Respondents

HDB/mhj
Encl.

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer)	)	MUR 2288

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 16, 1989, the Commission determined to enter into conciliation negotiations prior to a finding of probable cause to believe with the Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer, ("the State Party").

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III. RECOMMENDATIONS

1. Approve the attached proposed agreement submitted on behalf of Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer.

2. Approve the attached letters.

3. Close the file in this matter.

1/26/91
Date

Lawrence M. Noble
General Counsel

Attachments
1. Commission agreement
2. Respondents' agreement
3. Affidavits
4. Audit Materials
5. Proposed letters

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 1, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 2288:

1. Approve the proposed agreement submitted on behalf of Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer, as recommended in the General Counsel's Report dated January 26, 1990.

2. Approve the letters, as recommended in the General Counsel's Report dated January 26, 1990.

3. Close the file in this matter.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast votes.

Attest:

2-2-90
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., January 29, 1990 4:19 p.m.
Circulated to the Commission: Tues., January 30, 1990 11:00 a.m.
Deadine for vote: Thurs., February 1, 1990 11:00 a.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 8, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. Kay Christensen
Wayne Owens For Congress Committee
275 East South Temple
Suite 300
Salt Lake City, Utah 84111

RE: MUR 2288

Dear Ms. Christensen:

This is in reference to the complaint you filed with the Federal Election Commission on November 5, 1986, concerning the Republican National Committee and its treasurer, the Shimizu for Congress Committee and K. Helen Oniki, as treasurer, and the Utah Republican Party and its treasurer.

On March 10, 1987, the Commission found that there was no reason to believe the Republican National Committee and its treasurer violated any statute within the Commission's jurisdiction. Also on that date the Commission found reason to believe the Shimizu Committee violated 2 U.S.C. § 434(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended. Additionally, on December 10, 1987 the Commission found reason to believe the Shimizu Committee violated 2 U.S.C. § 441a(f). On November 28, 1988 the Commission accepted a signed conciliation agreement as to the Shimizu Committee and thus closed the file as to them.

Moreover, on March 10, 1987, the Commission found that there was reason to believe the Utah Republican Party and its treasurer violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6)(B)(iv) and 441a(d). On August 2, 1988, the Commission also found reason to believe the State Party violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). On February 1, 1990, a conciliation agreement signed by the State Party was accepted by the Commission. Accordingly, the Commission closed the file in this matter on February 1, 1990. Copies of these agreements are enclosed for your information.

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If you have any questions, please contact Patty Reilly the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures
Conciliation Agreements

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 8, 1990

William J. McManus, Treasurer
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2288
Republican National Committee
and William J. McManus, as
treasurer

Dear Mr. McManus:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 8, 1990

Tom Shimizu
Tom Shimizu for Congress Committee
2977 East 700 South
Salt Lake City, Utah 84121

RE: MUR 2288
Tom Shimizu for Congress Committee and K. Helen Oniki, as treasurer

Dear Mr. Shimizu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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OGC 9508

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 8, 1990

H. Dickson Burton, Esquire
Watkiss & Saperstein
310 South Main Street
Salt Lake City, Utah 84101-2171

RE: MUR 2288
Utah Republican Party
(Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer

Dear Mr. Burton:

On February 1, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 441a(f), 434(b)(6)(B)(4), 441a(d) and 441b, provisions of the Federal Election Campaign Act of 1971, as amended, as well as, 11 C.F.R. § 102.5(a)(1), a provision of the Commission's Regulations. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions,

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please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Utah Republican Party (Federal Account/Non-Federal Account) and Michael L. Jones, as treasurer	)	MUR 2288

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by M. Kay Christensen. The Federal Election Commission ("Commission") found reason to believe that Utah Republican Party (Federal Account/Non-Federal Account) and its treasurer ("Respondents") violated 2 U.S.C. §§ 441a(d), 441a, 434(b)(6)(B)(iv), 441d(a), 441b and 11 C.F.R. § 102.5(a)(1).

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

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

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

III. The pertinent facts in this matter are as follows:

1. Respondent, Utah Republican Party (Federal Account/Non-Federal Account) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Michael L. Jones, is the treasurer of the Utah Republican Party (Federal Account/Non-Federal Account).

3. Pursuant to 2 U.S.C. § 441a(d)(3)(B) and as adjusted by the Consumer Price Index for the 1986 general election, a state committee of a political party in Utah may not make any expenditure in connection with the general election campaign of a candidate for Representative who is affiliated with such party that exceeds $21,810.

4. Pursuant to 2 U.S.C. § 441a(f), political committees are prohibited from making expenditures exceeding the Act's limitations.

5. Pursuant to 2 U.S.C. § 434(b)(6)(B)(iv), a reporting committee must report each person who receives any expenditure under section 441a(d), together with the date, amount and purpose of any such expenditure, as well as the name of, and office sought by, the candidate on whose behalf the expenditure is made.

6. Pursuant to 2 U.S.C. § 441d, whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, such communication shall clearly state the name of the person who paid for the communication and state whether or not the communication is authorized by any candidate or candidate's committee.

7. Pursuant to 2 U.S.C. § 441a(a)(2)(A), no multicandidate political committee shall make contributions to any candidate or his authorized political committee with respect to any election for federal office that, in aggregate, exceed $5,000.

8. Pursuant to 2 U.S.C. § 441b, corporations and labor unions may not make any contributions in connection with a federal election.

9. Pursuant to 11 C.F.R. § 102.5(a)(1), entities conducting both federal and non-federal activity must make all expenditures for federal election activity from an account established for that purpose.

10. Respondents authorized the National Republican Congressional Committee ("NRCC") to make coordinated party expenditures on their behalf in connection with the 1986 general election campaigns in the First and Second Congressional Districts in Utah. The NRCC made coordinated party expenditures totaling $40,000 and $39,652 for these respective elections. The Republican candidates in these races were Jim Hansen and Tom Shimizu. Respondents also made the maximum permitted direct general election contribution to the Hansen Committee and more than the maximum permitted direct general election contribution to the Shimizu Committee by virtue of a $500.00 contribution which was not designated at the time to be used to retire debt incurred during the primary campaign. The $500.00 payment was later redesignated (see paragraph 18).

11. Subsequently, Respondents aired two radio ads directed towards the general election, clearly identifying Democratic candidate Wayne Owens that met the Commission's definition for coordinated party expenditures, on behalf of the Tom Shimizu for Congress Committee, subject to the limitation of 2 U.S.C. § 441a(d).

12. Respondents also conducted four mass mailings to Utah Republican voters directed towards the general election, clearly identifying general election candidates and containing electioneering messages that meets the Commission's definition for coordinated party expenditures, on behalf of Tom Shimizu, subject to the limitation of 2 U.S.C. § 44la(d). An additional mailer subject to the limits of 2 U.S.C. § 441a(d) was also made on behalf of the Hansen for Congress Committee.

13. The total cost of these radio ads and mailers was more than $50,000.

14. Respondents authorized the NRCC to make coordinated party expenditures on its behalf but made these additional expenditures as described above totaling more than $50,000.00 which met the Commission's definition for coordinated party expenditures, in violation of 2 U.S.C. § 44la(f). Respondents did not report these expenditures as section 44la(d) expenditures in violation of 2 U.S.C. § 434(b)(6)(B)(iv).

15. Respondents did not report $5,058.79 which met the Commission's definition for coordinated party expenditures made on behalf of the Garn for Senate Committee in violation of 2 U.S.C. § 434(b)(6)(B)(iv). This represents 50% of the expenditures for two of the four mass mailings on behalf of Tom Shimizu. In the two mailers, Senator Garn endorsed Tom Shimizu for Congress.

16. Respondents contend that, at the time the coordinated party expenditures discussed at sub-paragraphs 10-15 above were made, they believed such expenditures constituted exempt volunteer

activity or exempt party building activity, and for these reasons did not report them as coordinated party expenditures.

17. Respondents failed to include a statement on the mailings indicating whether such communications were authorized by the candidate in violation of 2 U.S.C. § 441d(a).

18. Respondents made a $500 contribution to the Shimizu for Congress Committee after the primary election to be applied toward debts incurred during the primary election campaign. However, the contribution was not specifically designated for the primary election campaign and, therefore, constitutes an excessive general election contribution to the Shimizu for Congress Committee in violation of 2 U.S.C. § 441a(a)(2)(A). The $500.00 contribution was later redesignated as a contribution to be applied toward debts incurred during the primary election campaign.

19. Respondents made approximately $48,440.56 in expenditures (approximately $38,000 of which were made during the month of October, 1986) for a Federal election from the Non-Federal Account in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). Approximately $16,000.00 was reimbursed by a Federal campaign committee on October 15, 1986. Another $12,342.00 in expenditures from the Non-Federal Account were not identified by any specific supporting documentation as expenditures for Federal candidates but may also have been expended in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1). This amount may also constitute disbursements for general party operations or for non-Federal candidates.

IV. Respondents enter voluntarily into this agreement with the Commission and assume responsibility for all violations and conduct described herein which Respondents contend took place at the level of Executive Director of the Utah Republican Party. Respondents contend that the actions described herein were a result of negligence and that there was no knowing and willful violation of any Federal statute or regulation.

V. The Hansen for Congress Committee, the Shimizu for Congress Committee, and the Garn for Senate Committee have submitted sworn statements regarding their role in the mailings and other issues which state that they had no knowledge that the expenditures described herein made by the State Party were coordinated party expenditures in excess of spending limits nor that any expenditures for Federal elections were made from the Non-Federal Account.

VI. A. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Ten Thousand dollars ($10,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

B. Respondents will amend their reports on file with the Commission to report the expenditures for mass mailers and radio ads as Section 44la(d) expenditures.

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

relief in the United States District Court for the District of Columbia.

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

Date 2/7/90

FOR THE RESPONDENTS:

Michael L. Jones, Treasurer
Utah Republican party (Federal Account/Non-Federal Account)

Date 1/10/90

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2288

DATE FILMED 3/6/90 CAMERA NO. 4

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