FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2936

DATE FILMED 11/28/90 CAMERA NO. 4

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OGC 2893

Federal Account Treasurer
Carroll County Republican
Central Committee
2810 Gillis Street
Mt. Airy, Maryland 21771
May 25, 1989

Office of General Counsel
Federal Elections Commission
999 E Street NW
Washington, D.C. 20463

Dear Sirs:

This letter is being sent in response to a telephone conversation of May 24, 1989, that Janet Hess of your office had with me regarding the Carroll County Republican Central Committee Federal Account (ID #C000232603).

The Carroll County Republican Central Committee (CCRCC) would like to request a review of the activities in its Federal Account. During the course of the 1988 Presidential campaign, funds from Victory '88, the Maryland Republican Party Federal Account, were diverted into the Federal Account of the CCRCC. This diversion of campaign funds was concealed from five of the seven members of the CCRCC. The members who had no knowledge of these activities are Donald Taylor, Vice-Chairman; Louis E. Wiser, Jr., Treasurer; Frank D. Coleman, Secretary; Joseph M. Getty; and Edwin E. Rash.

The diversion of funds consisted of deposits that were made between October 23, 1988 and November 14, 1988. The Federal Account treasurer's records show that between $19,300 and $20,700 were diverted to the CCRCC Federal Account. The deposits and disbursements of these funds were made under the direction of CCRCC Chairwoman Sharon W. Hornberger, with the knowledge of the CCRCC Federal Account Treasurer Gary W. Bauer and CCRCC member Frank Rammes.

At a meeting of April 18, the CCRCC passed a motion for the immediate appointment of CCRCC Treasurer Louis E. Wiser, Jr., as Federal Account Treasurer and the transfer of all accounts, ledgers, books, invoices, receipt and disbursement records, and other papers relating to activity in this account from Mr. Bauer to Mr. Wiser. A review of these materials and discussion of these issues at a meeting of May 4 raised additional questions. The CCRCC passed a motion at the May 4 meeting to request from Chairwoman Hornberger a written response to these questions. In a letter of May 20, Chairwoman Hornberger refused to respond and denied access to additional information that could clarify the activities that took place in this account.

Based on the treasurer's records available for review, irregularities in the administration of this account suggest possible violations in the following areas:

1) The treasurer's records do not provide proper identification for a majority of the contributors from outside of Carroll County to the CCRCC Federal Account;

2) The treasurer's records do not contain documentation that "best efforts" had been undertaken to obtain identification information;

3) Discrepancies in the treasurer's records and missing invoices call into question whether the treasurer's records met federal regulations;

4) Photocopies of the checks that were diverted to the CCRCC Federal Account show that some of the checks were not deposited within the 10-day time limit;

5) Photocopies of the checks show that 10 checks of $1000 each were received while the bank deposit slips show that only 9 were deposited;

6) Photocopies of the checks show that some of the checks deposited were not made out to the CCRCC Federal Account. Instead these checks were made out to "Victory '88," (the Maryland Republican Party Federal Account) and "FS Victory '88" (Free State Victory '88) and their deposit into the CCRCC Federal Account may be in violation of FEC regulations;

7) If these were illegal deposits, it may require the return of these funds to the contributors (17 of the 26 checks deposited in the diversion of campaign funds were made out to "Victory '88" and "FS Victory '88" totaling $7950), but this money has been transferred out of this account to other Federal Accounts in Maryland;

8) Photocopies of the checks show that some of the checks that were made out to "Victory '88" were altered on the face of the check by a written addition of the initials "CCRCCFA" on the payee line. The Maryland Republican Party has received correspondence from one of the contributors, Mr. Daniel Oliver, that states that this alteration of his $1000 check was unauthorized.

It is the desire of this committee to rectify any outstanding problems with the administration of the CCRCC Federal Account. Enclosed is documentation that provides some of the details of these activities. Please let me know if there are additional materials necessary for you to complete your review.

Sincerely,

Louis E. Wiser, Jr.
Federal Account Treasurer

Enclosures

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CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE ROSTER
September 1, 1988

Sharon W. Hornberger, Chairwoman
30 Chase Street
Westminster, Maryland 21157
848-1034 (H)
848-4460 (O)

Donald Taylor, Vice-Chairman
3500 Nicholson Road
Westminster, Maryland 21157
876-1139 (H)

Frank D. Coleman, Secretary
400 Baldwin Park Drive, Apt. B-2
Westminster, Maryland 21157
876-7125 (H)
848-5254 (O)

Louis E. Wiser, Jr., Treasurer
2810 Gillis Road
Mt. Airy, Maryland 21771
875-2524 (H)
393-2285 (O)

Joseph M. Getty
3270 York Street
P.O. Box 398
Manchester, Maryland 21102
374-2605 (H)
848-6494 (O)

Frank Rammes
1806 Tank Road
Finksburg, Maryland 21048
861-8407 (H)

Edwin E. Rash
5627 Old Washington Road
Sykesville, Maryland 21784
795-0443 (H)

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STATEMENT OF FINDINGS

On Activity in the Carroll County Republican Central Committee
Federal Account During the 1988 Presidential Campaign

May 25, 1989

This statement of findings has been prepared for review by the Office of General Counsel, Federal Elections Commission (FEC) in response to a telephone conversation of May 24, 1989, that Janet Hess of the FEC had with Louis E. Wiser, Jr, Treasurer of the Carroll County Republican Central Committee Federal Account (ID #C000232603).

The Carroll County Republican Central Committee (CCRCC) served as a conduit for a diversion of funds from Victory '88, the Maryland Republican Party Federal Account, into the CCRCC Federal Account. Five of the seven memmbers of the CCRCC were not involved in the diversion of funds from Victory '88. The members who had no knowledge of these activities are Donald Taylor, Chairman; Louis E. Wiser, Jr., Treasurer; Frank D. Coleman, Secretary; Joseph M. Getty; and Edwin E. Rash.

The diversion of funds consisted of deposits that were made between October 23, 1988 and November 14, 1988. The Federal Account treasurer's books show that $20,700 were diverted to the CCRCC Federal Account. There is a discrepancy, however, in the total amount because the deposit slips indicate a diversion of $19,300. These funds were disbursed for various campaign and officeholder expenses. The deposits and disbursements were made under the direction of CCRCC Chairwoman Sharon W. Hornberger, with the knowledge of the CCRCC Federal Account Treasurer Gary W. Bauer and CCRCC member Frank Rammes.

Background

The Carroll County Republican Central Committee is a party governing body at the county level as defined in Article 33, Section 11 of the Annotated Code of Maryland. Its purpose and procedures are delineated in the Constitution and Bylaws of the Maryland Republican Party, and the Constitution and Bylaws of the Carroll County Republican Central Committee, adopted May 7, 1987.

Article II of the local Bylaws states the party committee's purpose as: "The Committee shall work for the election of duly nominated Republican candidates, promote the principles and platform of the Republican Party, organize an effective political organization, cooperate with the State Central Committee, and engage in fund raising to support its activities."

The members of the CCRCC as of September 1 were: Sharon W. Hornberger, Chairperson; Donald Taylor, Vice-Chairman; Frank D. Coleman, Secretary; Louis E. Wiser, Treasurer; Joseph M. Getty; Frank Rammes; and Edwin E. Rash. Gary W. Bauer, who was not a member of the CCRCC but served as a member of the Carroll County Bush Committee served as the Federal Account Treasurer.

Activities by the Carroll County Republican Central Committee to support candidates in Maryland state elections are performed under state law administered by the State Administrative Board of Election Laws (SABEL). The CCRCC maintains a state campaign fund and files reports as required by SABEL on the activities in that account.

To participate in campaigns at the Federal level (Presidential, U.S. Senate, and U.S. House of Representatives), the CCRCC must establish an account with the Federal Elections Commission (FEC) as provided for in 11 CFR. In the past, the CCRCC has established such an account several months prior to the Presidential election every four years, and then closed the account shortly after the Presidential campaign.

In January 1989, two committee members requested that the CCRCC's Federal Account be kept open. At the April 6 meeting of the CCRCC, a vote was taken to keep the Federal Account open but to transfer the record-keeping responsibilities from Federal Account Treasurer Gary W. Bauer, who was not a CCRCC member, to the CCRCC Treasurer Louis Wiser. (Attachment 1 CCRCC Minutes of April 6, 1989)

Before transferring the books to Mr. Wiser, Chairperson Sharon W. Hornberger informed him that there were inaccuracies in the account balance of the Carroll County Republican Central Committee Federal Account. She stated that while the balances were accurate with the FEC reports, that two sets of books were kept for this account and that the CCRCC members were only informed about funds raised and expended within Carroll County. She asked him to keep this information from the other CCRCC members. He replied that he could not conceal this information from the other members of the CCRCC.

Mr. Wiser contacted the other members of the CCRCC and called a special meeting for April 18, 1989 for the purpose of determining exactly what took place in the use of the CCRCC's Federal Account during the 1988 Presidential Campaign. The first response of those members not involved was to prepare a letter to State Party Chairman Daniel E. Fleming requesting that the Maryland Republican Party conduct an investigation of this diversion of campaign funds. This letter was read to Chairman Fleming over the telephone on April 16, 1989. Mr. Fleming responded that because of the intra-party fighting currently ongoing, it would be better for the CCRCC to conduct its own investigation. He felt that if he became involved it would be viewed that he was trying to stir up a controversy to embarass Congresswoman Helen Bentley.

At the meeting of April 18, National Committeeman Richard Taylor and National Committeewoman Helen Bentley provided a general description of the Bush campaign at the state level. Chairwoman Hornberger gave a general description of the activity in the Federal Account and the reasons for this activity. At this point, few details of the receipts and disbursements from this account had been presented, and the five members who were not involved recessed to review the actual FEC reports that had been obtained independently. These reports raised a number of concerns about the use of the CCRCC Federal Account, including the presentation of false treasurer's reports to the CCRCC (Attachment 2 Comparison of Balances Presented by Federal Account Treasurer Gary W. Bauer) and the extent of receipts and disbursements from outside of Carroll County throught the CCRCC Federal Account. (Attachment 3 Summary of the Federal Elections Commission Documents)

In response to these concerns, the CCRCC passed two motions to obtain additional data. First, it was requested that the Chairwoman provide a detailed written statement about the source of receipts, the nature of expenditures, the people involved in decision-making, and the reasons why such activity took place. Secondly, the CCRCC called for the immediate appointment of CCRCC Treasurer Louis E. Wiser, Jr., as Federal Account Treasurer and the transfer of all treasurer's records from Mr. Bauer to Mr. Wiser. (Attachment 4 CCRCC Minutes of April 18, 1989)

The written statement prepared by Chairwoman Hornberger was reviewed by the CCRCC at the May 4 meeting. (Attachment 5 Response of Chairwoman Hornberger, April 27, 1989) Additional concerns about possible violations of FEC regulations were raised at this meeting when Mr. Bauer presented photocopies of the checks that were diverted to the CCRCC Federal Account. After a lengthy discussion and numerous additional questions were raised, it was determined by the CCRCC that the written statement was unsatisfactory. A motion was passed to submit a set of questions to Chairwoman Hornberger for a written response. (Attachment 6 CCRCC Minutes of May 4, 1989)

These questions were delivered on May 8, with a request for response by May 22. (Attachment 5 Questions Regarding the Use of the CCRCC Federal Account, May 8, 1989) Chairwoman Hornberger responded by stating that it was her opinion that the investigation had been refered to the Maryland Republican Party and that she would "in the future, not further address this issue to this Committee." (Attachment 7 Response of Chairwoman Hornberger, May 20, 1989)

Concerns of Possible FEC Violations

The primary concern of those who were not involved is the legality of this diversion of campaign funds and associated actions. Administering campaign funds is the most visible and public activity of a central committee and the diversion of these federal campaign funds, which was kept secret from other committee members, gives the appearance that these activities may have violated federal and/or state laws.

At the special meeting of April 18, a motion was passed for the immediate transferral of all accounts, ledgers, books, invoices, receipt and disbursement records, and other papers relating to activity in this account from Mr. Bauer to Mr. Wiser. The treasurer's records conveyed on April 18 were clearly lacking the documentation required by the FEC. The areas of concern of the committee are covered in the "Questions Regarding the Use of the CCRCC Federal Account." (Attachment 7)

The lack of documentation raised the following questions about whether FEC violations occurred:

1) The treasurer's records did not provide proper identification for a majority of the contributors from outside of Carroll County to the CCRCC Federal Account. 11 CFR 100.12 and 11 CFR 102.9 (a);

The account books only contained the names of the contributors. Addresses for the contributors in amounts over $250 were listed in the FEC reports. Proper identification required by 11 CRF 100.12 includes name, address, occupation, and employer. The materials submitted by Mr. Bauer did not include occupation and employer information for 17 of 24 contributors. (Attachment 9 Analysis of Checks from Contributors from Outside of Carroll County)

2) The treasurer's records did not contain documentation that "best efforts" had been undertaken to obtain identification information. 11 CFR 104.3 (a) (4) (i) and 11 CFR 104.7;

The FEC requires that Federal Accounts exert "best efforts" to obtain identification information. Mr. Bauer states in the FEC

reports that occupation and employer information had been requested. A letter from the FEC to the CCRCC of February 8, 1989 states, "If your committee has made at least one effort per solicitation, either by written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have exercised 'best efforts.' If you believe that your committee satisfies that 'best efforts' provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contributor information." The treasurer's records released on April 18, 1989 do not provide documentation for "best efforts," nor do they indicate that a response was made on this issue to the FEC.

3) There are several discrepancies in the treasurer's records. An example is the differences in total receipts listed: (1) the treasurer's account book lists $38,395.58; (2) the bank deposit slips list $36,851.72; and (3) the FEC reports shows receipts of $37,266.61. In addition, the treasurer's records did not contain invoices relating to $3832 of disbursements for "computer rental." These and other questions relevant to the general condition of the books, call into question whether the treasurer's records met federal regulations. 11 CFR 102.9 (d); 11 CFR 104.14; 11 CFR 110.9 (b).

The number of questions that arose during the FEC review of the CCRCC reports and the technical corrections required indicate that there were problems in the general understanding of FEC codes and the reporting process. Two separate sets of accounts were maintained in order to conceal from the majority of the CCRCC members the fact that outside funds were within the Federal Account. There are general problems with the treasurer's recordkeeping, such as the differences in total receipts listed in the account book ($38,395.58), the bank deposit slips ($36,851.72); and the FEC reports ($37,266.61). The general condition of the treasurer's records raises concerns about whether proper accounting procedures were followed.

Another area of concern are the "computer rental" disbursements of $3832 for which there are no invoices or other documentation. Chairwoman Hornberger provided an explanation that these disbursements were not "computer rentals," but instead were actually services rendered at $6.00 per hour. She stated that time sheets would be available to document these services. In addition to the fact that there is no documentation for these services, these payments appear odd for other reasons: (a) that payment was not made on these presidential campaign services until late January and early February; (b) that the two January 27 checks (to Leslie Jacoby for $2200 and to Marge Neuman for $1200) are made out in a different handwriting than any other the other Federal Account checks, but are still signed by Mr. Bauer; and (c) that the two checks to Leslie Jacoby (January 27 for $2200 and February 7 for $432) appear to have not been deposited into a bank account but instead were cashed out. These and other questions relevant to the general condition of the books, call into question whether the treasurer's records met federal regulations.

4) The photocopies show that some of the checks were not deposited within the 10-day time limit established by the FEC. 11 CFR 103.3 (a);

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The "Analysis of Checks from Contributors from Outside of Carroll County" (Attachment 9) indicates that 11 out of 24 checks appear to have not been deposited within the 10-day time limit. These 11 checks total $4850. In addition, two checks totaling $700 are not dated with a day of the month.

5) Photocopies of the checks show that 10 checks of $1000 each were received while the bank deposit slips show that only 9 were deposited;

The "Analysis of Checks from Contributors from Outside of Carroll County" (Attachment 9) indicates that ten checks of $1000 each were received by the CCRCC. All ten of these checks appears in the FEC reports. However, the deposit slips indicate that only nine of these checks were deposited.

6) Photocopies of the checks show that some of the checks deposited were not made out to the CCRCC Federal Account. Instead these checks were made out to "Victory '88," (the Maryland Republican Party Federal Account) and "FS Victory '88" (Free State Victory '88) and their deposit into the CCRCC Federal Account may be in violation of FEC regulations. 11 CFR 103.2 and 11 CFR 103.3 (a);

Kathleen Debarra of the FEC Public Information Office has stated in a telephone conversation of May 8, 1989, that the FEC has strict regulations about what constitutes a legal transfer between committees. A check written out to a certain Federal Account has to be deposited in the account of that name. A legal transfer is then made by writing a check on that account. A committee may also set up a transmittal account to deposit checks that are going to a different account. However, this was not done with the "Victory '88" and "FS Victory '88" checks. In this instance, the original check was deposited into the CCRCC Federal Account. The acceptance of these checks by the CCRCC Chairwoman and the CCRCC Federal Account Treasurer appears to be in violation of FEC regulations.

7) If the FEC determines that these were illegal deposits, it may require that illegally deposited checks be returned to the contributors and it may also levy a fine against the CCCRCC. Of the 26 checks deposited in the diversion of campaign funds, 17 were made out to "Victory '88" and "FS Victory '88" totaling $7950. If the FEC rules against the CCRCC, this will be a considerable liablity that the whole committee will face. 11 CFR 103.3 (b) (2)

The CCRCC Chairwoman has stated on several occasions that the Committee is not liable for her actions because the Federal Account Treasurer is personally responsible. What the FEC code states is "Each treasurer of a political committee... shall be personally responsible for the timely and complete filing of the report or statement and for the accuracy of any information or statement contained in it." 11 CFR 104.14 (d) However, the entire committee is liable for violations of federal code outside of the reporting responsibilities of the treasurer. If the political committee does not have sufficient funds to refund the

contribution at the time the illegality is discovered, the committee shall make the refund from the next funds it receives. This matter also raises a concern about the $10,000 that was transferred out of this account and into other Maryland Federal Accounts.

8) Photocopies of the checks show that some of the checks that were made out to "Victory '88" were altered on the face of the check by a written addition of the initials "CCRCCFA" on the payee line. The Maryland Republican Party has received correspondence from one of the contributors, Mr. Daniel Oliver, that states that this alteration of his $1000 check was unauthorized.

The "Analysis of Checks from Contributors from Outside of Carroll County" (Attachment 9) indicates that 13 checks in the November 2 deposit were altered. These 13 checks total $5850. A copy of the letter from Mr. Daniel Oliver shows that Mr. Oliver did not authorize the alteration of his $1000 check and requests a response to a number of other issues regarding the use of this account, including the identity of the person who altered the check. (Attachment 10 Letter from Daniel Oliver)

Other Concerns Outside of the FEC Domain

A final legal concern exists about whether state laws that regulate the activities of central committees were violated. Article 33, Section 24-3 of the Annotated Code of Maryland states: "Neglect or fraud by officials. If any ... member of any committee, or of the governing body, of any political party participating in primary elections under this article, or any delegate to a convention or party executive, of whom any duty is required in this article, or by any other electionlaw of this State shall be guility of any wilful neglect of such duty, or any corrupt or fraudulent conduct or practice in the execution of the same, he shall, upon conviction thereof, be punished by imprisonment in jail for not less than thirty days nor more than three years, or by a fine of not less than fifty dollars ($50) nor more than one thousand dollars ($1000), or by both such fine and imprisonment."

A secondary area of concerns exists within the internal matters of the CCRCC. Checks were made out to the Federal Account by people who thought that their contributions would go directly to support the Bush campaign in Maryland. The types of expenditures made from the CCRCC Federal Account have questionable relevance to the actual Bush campaign. One contributor, Mr. John Burcham, has written to the Maryland Republican Party to express his concern that he was mislead into writing a check to "CCRCCFA." This reflects poorly upon the CCRCC and its political operations. (Attachment 11 Letter from John Burcham)

Also of considerable concern to the internal matters of the CCRCC is the secret activities of Chairwoman Hornberger, Federal Account Treasurer Bauer, and Member Rammes to make the CCRCC Federal Account available for the diversion of campaign funds. The by-laws of the CCRCC do not provide for the Chairwoman to take such actions. Furthermore, the "will of the Committee" as established in the minutes of the CCRCC and by the memo about "Written Treasurer's Reports" of September 28, 1988, was that all of the CCRCC members would be informed about any and all activities in the Federal Account. (Attachment 12 Memo on Written Treasurer's Reports) The actions of those involved in maintaining a separate set of

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treasurer's books and in the preparation and presentation of fradulent reports to the other committee members are inexcusable.

The Bylaws provide in Article III, Section 3 (A) (3), that the responsibilities of the Chairperson are to "conduct the affairs of The Committee within the established laws of Maryland, the Republican Party, the Constitution and Bylaws of the Committee, and the established purposes and will of the Committee."

The Minutes of the July 20, 1988, meeting which provide for the general conduct of the Federal Account are excerpted below:

> "Federal Account: A final summary of the discussion over the federal account was presented by Chairperson Hornberger. It was determined that there will be one, single federal account. The funds will be dedicated to the committee that raised that portion of the funds, with the line of authority for disbursement resting with the committee that raised those funds. If a committee needed funds in addition to those that they had raised, a federal account committee of four persons will be established to have authority over such a disbursement. This federal account committee will consist of the Central Committee treasurer, the federal account treasurer, and a designated member of each committee. Motion made by Mr. Getty. Seconded by Mr. Taylor. Motion passed unanimously."

The "established purposes and will of the Committee" regarding the Federal Account was that the entire membership of the CCRCC be kept accurately informed of all of the activities within the Federal Account. This fact is confirmed in the letter of Federal Account Treasurer Gary W. Bauer to the Federal Elections Commission of October 20, 1988. In response to a request for a clarification of the Statement of Organization, Bauer states, "this committee is the Carroll County Republican Central Committee and its members set [sic] on the Republican Central Committee of Maryland." This fact is further confirmed by the liability that all of the committee members share should the Federal Elections Commission determine a judgement with fines against the CCRCC.

This fact is also confirmed in the internal matters of the CCRCC. In response to questions raised by the Crab Feed report presented by Federal Account Treasurer Bauer on September 22, 1988, Mr. Getty sent a memo (dated 9/28/88) to all CCRCC members requesting written treasurer's reports that identify all activity in the accounts (Attachment 10 Memo on Written Treasurer's Reports). At the October 6 meeting, Treasurer Bauer presented a "comprehensive report of activites in the Federal Account" with a committment to present similar reports at all future meetings.

CONCLUSIONS

Chairwoman Sharon W. Hornberger, Federal Account Treasurer Gary W. Bauer and Member Frank Rammes were responsible for actions that may involve violations of federal or state law regarding campaign funds and that may place the entire committee in a position of liability for refunds to contributors and fines. In particular, Chairwoman Hornberger made the decision to use the CCRCC for the diversion of funds and made the decision not to inform the majority of the members of the CCRCC. All three were involved in concealing these activities from the other members.

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RECOMMENDATIONS

a) A motion passed at the special meeting of April 18 directed Federal Account Treasurer Wiser to "proceed immediately with contacting the Federal Elections Commission to resolve any open matters in reports prepared and submitted to the Commission on behalf of the Committee." As a result of his discussions, the FEC has recommended that the CCRCC submit a letter with background information to the FEC Office of General Counsel for review about possible campaign law violations by their staff. We recommend that this letter and background information be sent to the FEC Office of General Counsel;

b) We recommend that a letter with background information be sent to the Maryland Republican Party for review by their legal counsel with regard to the actions of those involved for possible violations of state campaign laws and state and federal banking laws; and

c) We recommend that the CCRCC convene a public meeting of the Republican elected officials in Carroll County to explain to them the nature and activity in the Federal Account that occurred outside of Carroll County and the actions that the Committee has taken to restore the integrity of the Committee and to guarantee that such activities dealing with campaign finances do not occur in the future.

Attachments

1 CCRCC Minutes for April 6, 1989

2 Comparison of Balances Presented by Federal Account Treasurer Gary W. Bauer

3 Summary of the Federal Elections Commission Documents

4 CCRCC Minutes for April 18, 1989

5 Response of Chairwoman Hornberger, April 27, 1989

6 CCRCC Minutes for May 4, 1989 (copy to be forthcoming)

7 Questions Regarding the Use of the CCRCC Federal Account, May 8, 1989

8 Response of Chairwoman Hornberger, May 20, 1989

9 Analysis of Checks from Contributors Outside of Carroll County (with Copies of the Checks)

10 Letter from Daniel Oliver

11 Letter from John Burcham (copy to be forthcoming)

12 Memo on Written Treasurer's Reports

ATTACHMENT 1

CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE
MINUTES FOR APRIL 6, 1989

MEMBERS PRESENT: Sharon Hornberger, Don Taylor, Frank Coleman, Joe Getty, Frank Rammes, Lou Wiser, Ed Rash.

The meeting was held at Mr. Wiser's home and was called to order at approximately 7:43 p.m.

OLD BUSINESS:

The following items were discussed.

Secretary's Report: Minutes from the March 3, 1989, meeting were submitted, and amended by the Secretary to reflect that Joe Getty was not present at said meeting, and a Motion was made by Mr. Rammes to accept the minutes as amended, which was seconded by Mr. Wiser, and was unanimously approved. Minutes from the March 16, 1989, special meeting to discuss the Committee's proposed budget were submitted, as prepared by Mr. Rammes, and a Motion was made by Mr. Rash to accept the minutes as submitted, which Motion was seconded by Mr. Getty, and unanimously approved.

Treasurer's Report: A written treasurer's report was submitted by Mr. Wiser, and is attached hereto as Exhibit A. A Motion was made by Mr. Rash to accept the report as submitted, which motion was seconded by Mr. Taylor, and unanimously approved by the Committee.

Federal Account - Ms. Hornberger reported that the State Party has requested that the Committee maintain its Federal Account. Ms. Hornberger said that in the 1988 Federal Election, only 4 Counties opened Federal Accounts in a timely manner. All other Counties had to record their contributions and disbursements through the State Party Victory Account, and the State Party had to do bookkeeping for these Counties, which was a burden. She stated that we must file a monthly report on the Federal Account, unless there is an exemption granted by the Federal Election Commission. Ms. Hornberger also reported that Dick Taylor stated that he would find a contributor to cover the cost of this monthly reporting, so that the Committee could keep its Federal Account open at no cost to the Committee. A Motion was made by Mr. Rammes to keep the Federal Election Account open, which motion was seconded by Mr. Rash. The Motion was then amended to apply for an exemption from the FEC to avoid monthly reporting. The Motion as amended was unanimously approved by the Committee.

Discussion was then held that the treasurer of the Federal Account should be a Committee member. Mr. Wiser expressed that the Committee should reconsider its position of holding open the Federal Account if no exemption is forthcoming from the FEC. A Motion was made by Mr. Taylor, which motion was seconded by Mr. Rash, that the treasurer of the Federal Account be changed to Mr. Wiser. This Motion was approved by the Committee by a majority of 5 votes to 1.

The following items were discussed and actions taken:

1. Sheriff Candidate - Mr. Getty pointed out that Jerry Gooding may become available as a candidate for the Sheriff's position as a result of his resignation as Security Chief at Western Maryland College. Mr. Gooding is a retired Maryland State Police Lieutenant, who was formerly in charge of the Resident Trooper Program for Carroll County. Mr. Rammes noted that the Committee should contact incumbents to determine if they are running for reelection, and if so, the Committee should take no action with regard to recruiting individuals for these positions. Mr. Taylor suggested the Committee give consideration to a candidate school to help individuals with local elections.

2. Crab Feast - Ms. Hornberger suggested that the Committee should discuss the various fund raising activities for which the clubs intend to be responsible, when they respond to a letter from Mr. Taylor requesting their desires in this regard. Mr. Taylor has not yet sent out the letter because he wanted to first check with Mr. Hickman, State's Attorney for Carroll County, for his approval regarding the fund raising activities that were held at last year's crab feast. Mr. Hickman has given his approval to these activities. Mr. Taylor presented a letter in draft to be sent to the clubs by the Secretary of the Committee.

3. Report of Finance Committee - A final report prepared for the sub-committee by Mr. Wiser, and presented by Mr. Wiser to the Committee, reflects changes adopted by the sub-committee to its initial draft at the special meeting in this regard held on March 16, 1989. The sub-committee report, dated April 1, 1989, as presented to the Committee, is attached hereto as Exhibit B. Regarding a Booster Club, Mr. Taylor suggested

ATTACHMENT 2

Comparison of Balances Presented by

Federal Account Treasurer Gary W. Bauer in

Reports to the Carroll County Republican Central Committee

and the Federal Elections Commission

CCRCC Balances		Federal Elections Commmission Balances		
			Version 1	Amended Rpt
9/22	2802.36			
10/6	5191.43			
11/3	2068.98	10/26	4648.	12340.
12/1	1359.93	11/21	20924.	20924.
1/5	797.77	12/31	16832.	16832.
2/2	87.10	1/31	13490.	
3/3	87.10	2/28	1155.	

Total Receipts in 1988 as Shown on CCRCC Reports Compared to FEC Reports:

CCRCC: 14207.* FEC 37076.

*This figure is difficult to determine based on the figures presented in the CCRCC minutes. No end of year accounting was made for this account.

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ATTACHMENT 3

Summary of Federal Election Commission
Documents on the Federal Account of the
Carroll County Republican Central Committee
ID # C00232603

Statement of Organization

This was received by FEC on 9/26/88 (but was dated 1/21/88).

FEC responded with a letter on 10/12/88 the stating that the CCRCC Statement of Organization was incorrect; requested clarification of the type of committee.

Mr. Bauer sent a letter dated 10/20/88 to FEC stating that the account is for the CCRCC, a subordinate committee of the Maryland Republican Party.

12 Day Pre-General Report

Open Bal. 0 Rec. 15320 Disb. 10671 Bal. 4648

This was submitted on 10/26/88 (covering period 1/1/88 to 10/27/88) Contains primarily disbursements authorized by the CCRCC relating to the fundraiser and headquarters operations. It follows closely to the 10/6/88 report of Bauer to the CCRCC except for an area concerning loans. The report to the CCRCC identifies 2 loans ($500 & $400) from G. Melvin Mills. The FEC report contains only the $400.

FEC responded with a letter on 2/8/89 with the following questions:

1) Questions whether contributions from local clubs ($4005) are qualifying funds; clarify if permissible, if not permissible then refund the impermissible amounts to the donors.

Amended report submitted by Bauer on 2/23/89.

Open Bal. 0 Rec. 25320 Disb. 12979 Bal. 12340

This amended report includes an additional $10,000 of receipts made by individuals from outside of Carroll County (10 individuals at $1000 each). The dates of receipts range from 9/23/88 to 10/26/88 but they were not shown on the first submittal of the 12 Day Pre-General report. They were inaccurately submitted on the first submittal of the 30 Day Post General Report. This amended report corrects this discrepancy and also shows a proration of advertising expenditures. It does not address the concerns about contributions from local clubs.

FEC responded with a letter on 3/2/89 stating that the 2/23/89 response by Bauer to the 2/8/89 inquiry was incomplete. Requests clarification of the local club funds. Requires a response within 15 days or the FEC may choose to initiate audit or legal enforcement action.

Bauer responds on 3/13/89 requesting further time to compile the information to justify the contributions on the 12 Day Pre-General Report.

FEC records as of April 17 indicate no further activity on this issue.

30 Day Post General Report

Open Bal. 4648 Rec. 21268 Disb. 4992 Bal. 20924

This was submitted on 11/21/88 (covering period 10/27/88 to 11/21/88) Contains first appearance of substantial donors from locations outside of Carroll County including $2000 from one firm, Tudor Manor Partnership (23 Ellendale St. Bel Air), and $5000 from the Drive Political Fund (25 Louisiana Ave., NW, DC). There is a $1000 receipt from the Bentley Re-Election Committee, Inc. on 10/28/88, but this money is disbursed back to the same committee on 11/7/88. There is a $204 disbursement to Sharon Hornberger for pins for volunteers.

FEC responded with a letter on 2/8/89 with the following questions:

1) Some of the reporting activity should have been on the prior report and not this one. Requires amending both reports.

2) Totals were not submitted on certain lines.

3) Requests clarification of advertising expenses.

4) Questions the limited payments for administrative expenses, which would require allocation between federal and non-federal funds.

5) Contribution from Tudor Manor Partnership has to be attributed to the names of the owners.

6) Requests the names of employers for those submitted by Bauer with the citation "Information Requested."

Amended report submitted by Bauer on 2/23/89.

Open Bal. 12340 Rec. 11268 Disb. 2684 Bal. 20924

These figures correlate with the amended report of the 12 Day Pre-General Report.

Year End Report

Instead of submitting a report from the last reporting period to the end of the year, Mr. Bauer submitted on 1/28/89 an annual report showing all activity in 1988 (covering period 1/1/88 to 12/31/88)

Open Bal. 0 Rec. 37076 Disb. 20243 Bal. 16832

New expenses shown during this period are:

a) Ambassador John Gavin (2121 Avenue of the Stars, Suite 3300, Los Angeles, CA 90067) for "outside service"; 12/14/88 $2012.

b) Admiral Limosine Service (1104 Princess At., Alexandria VA) for "outside service"; 12/14/88 $460.

c) International Limosine Service (4546 Annapolis Rd. Balto., MD) for "outside service"; 12/14/88 $500.

d) Postmaster, Westminster, MD, postage; 12/15/89, 375.

FEC responded with a letter on 2/15/89 with the following concerns:

1) This report contains overlapping coverage that creates difficulties in accounting for cash flow. Requests an amended report.

2) Discrepancy exists between beginning cash balance and the ending balance on the 30 Day post-General.

Amended report submitted by Bauer on 2/28/89 covering period from 11/21/88 to 12/31/88).

Open Bal. 20924 Rec. 0 Disb. 4091 Bal. 16832

This amended report deletes the "outside services" description and provides the following:

a) Ambassador John Gavin (2121 Avenue of the Stars, Suite 3300, Los Angeles, CA 90067) for "travel expenses Amb. Gavin"; 12/14/88 $2012.
b) Admiral Limosine Service (1104 Princess At., Alexandria VA) for "travel expenses Amb. Gavin"; 12/14/88 $460.
c) International Limosine Service (4546 Annapolis Rd. Balto., MD) for "travel expenses Congresswoman Bentley; 12/14/88 $500.

January 1989 Monthly Report

Open Bal. 16832 Rec. 190 Disb. 3532 Bal. 13490

New expenses shown during this period are:

a) Leslie Jacoby (1740 Weston Ave., Parkville, MD) for "computer rental"; 1/27/89 $2200.

b) Marge Newman (4226 Thornclift Road, Balto., MD) for "computer rental"; 1/27/89 $1200.

February 1989 Monthly Report

Open Bal. 13490 Rec. 0 Disb. 12334 Bal. 1155

New expenses shown during this period are:

a) International Limosine Service (P.O. Box 7410, Balto., MD) for "travel"; 2/7/89 $1000.
b) Leslie Jacoby (1740 Weston Ave., Parkville, MD) for "computer rental"; 2/7/89 $432.
c) Baltimore County Victory Fund (4226 Thornclift Road, Balto., MD same address as Marge Newman in January 1989 report) for "transfer"; 2/9/89 $5000.
d) Freestate Victory (5505 Rusk Ave., Balto., MD) for "transfer"; 2/22/89 $5000.

Letter from Bauer to FEC

Dated 3/7/89 and requesting report filing status be changed from monthly to quarterly. FEC records as of April 17 indicate no further activity on this issue.

ATTACHMENT 4

CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE
MINUTES FOR APRIL 18, 1989

MEMBERS PRESENT: Sharon Hornberger, Don Taylor, Frank Coleman, Lou Wiser, Joe Getty, Frank Rammes, Ed Rash.

Guests Present: Helen Bentley, U.S. Representative; Dick Taylor, National Committeeman; Ray Beck, State Senator; Mike Cosmos, Baltimore County Central Committee Member and Staff Member of Representative Helen Bentley; Gary Bauer, Former Committee Federal Account Treasurer.

The meeting was held at Mr. Wiser's home and was called to order at approximately 8:00 p.m.

REASON FOR MEETING: This was a special meeting called at the request of Mr. Wiser, and for which a petition to hold said special meeting was presented to Secretary Coleman, signed by Messrs. Getty, Wiser, Taylor, Rash and Coleman, and which is attached hereto as Exhibit A. This meeting was called after Mr. Wiser became aware that funds had been deposited in the Committee's Federal Account and disbursed therefrom, with the acknowledge of Chairperson Hornberger, Mr. Rammes and Mr. Bauer, but without the knowledge of Messrs. Taylor, Coleman, Wiser, Getty and Rash. Further, the monthly reports submitted to the Committee by the Committee's former Federal Account Treasurer, Mr. Bauer, did not accurately report the total funds deposited to said account, disbursed from said account, or the balance therein, and that this was done with the knowledge of Chairperson Hornberger and Mr. Rammes. Knowledge of this situation came to Mr. Wiser, after he had been voted by the Committee on April 6, 1989, to replace Mr. Bauer as Federal Account Treasurer, and he was made aware of the situation by Chairperson Hornberger with the Federal Account and was requested to keep this information confidential, which he declined to do, but instead called this special meeting.

ORDER OF BUSINESS:

The meeting was opened by Mr. Wiser posing the question to Chairperson Hornberger as to why the full Committee was not made aware of the situation with the Federal Account. National Committeeman Taylor initially responded to this question by presenting some background information. He said that the State Party has always asked that the Federal Account be kept open to help in emergency situations, and for purposes of flexibility in

having money around the State, so that it is not all in one place. Further, he stated that some contributors don't want to contribute directly to the State Party. Therefore, it is desirable to have a place where such contributions can be made. In this regard, he had approached Chairperson Hornberger and asked if the Committee's Federal Account could be used in this way. He indicated several other Counties Committee accounts had been used in this manner, but when questioned by Mr. Coleman, declined to specify which Counties.

Representative Bentley then presented the background to this situation from her perspective. She stated that when she was approached by Mr. Bush's Campaign Officials to become involved in the election, Mr. Bush was very low in the polls. Therefore, money had to be raised. Thus, individuals who were very active politically were looked for to help carry Maryland for Mr. Bush. Previous to this there was no organization, even at the State Party level. The organization that was built has stayed together, and is working on building up the party in the State. The money in all Federal Accounts was properly reported and spent. No one got any money that was not suppose to. These counties that helped, are now trying to be helped with speakers, etc. Previously, the State Party was split into factions, which are now beginning to work together.

Chairperson Hornberger presented her perception of the background to this situation by stating that the Committee had held a fund raiser (at Frock's), and contributions in the amount of $1,000.00 had been obtained. Consequently, the Federal Account was opened. Later, in October, she was asked about use of the Federal Account, as stated above. At this time, a letter involving Willie Horton was at issue, and there was a lot of dissension in the party. Thus, she was asked if the Carroll County Federal Account could be used. She was asked if only people involved in the Bush Campaign could be kept aware of these funds, because of the atmosphere in the party at that time. She was concerned about perceived problems of confidentiality with the Committee's meetings. Therefore, when she was asked by the Bush Campaign officials to maintain confidentiality, she did so, believing it was within the discretion of the Chair of the

Committee. It didn't seem to her that the Bush Campaign or Republicans should lose out because of contributors who didn't care for State Party Leaders and wouldn't contribute to the State Party.

Mr. Wiser raised the objection that there were people on the Committee who had no say in how the money was raised or how Mr. Rammes spent the money on behalf of the Bush Campaign. Further, he raised the issue that if there was an impropriety noted as a result of an FEC audit, the whole Committee would be responsible. To this U.S. Representative, Helen Bentely responded that no, only the Federal Account Treasurer would be responsible. Mr. Wiser responded with the question whether ethically it was okay to hide something from the rest of the Committee members, and that the Treasurer's reports were not correct. Chairperson Hornberger pointed out that the figures concerning the County funds were correct as reported to the Committee.

Mr. Rammes noted that he was the only member of the Committee that was involved in the Bush Campaignother than Ms. Hornberger. He pointed out that the Committee had not raised the money, and therefore, and had no control over how it was spent.

Mr. Wiser pointed out that National Committeeman Taylor was surprised that the rest of the members on the Committee did not know of the situation, and that he did not know of any issue of confidentiality among the Committee members.

Chairperson Hornberger reported that she was told this was to be done on a "need-to-know" basis.

Mr. Bauer reported that he was told by Chairperson Hornberger to not report these additional funds to the Central Committee.

Representative Bentley, reviewed specifically her problems with regard to the reason for secrecy, as being: (1) So that money would not go directly to the State Party, because some contributors would not contribute then. (2) So that the opposition, i.e., Dukakis Campaign officials, would not know what the Bush Campaign was doing and how much money it had raised.

The five (5) members of the Committee who had not known of this situation recessed. Mr. Getty submitted to these members reports he had obtained at the Federal Elections Commission in Washington D.C., as well as a summary of the Federal Election Commission documents he had prepared, and comparison of balances presented by Mr. Bauer to the Commission as opposed to the Committee, which Mr. Getty had also prepared. These reports revealed that approximately Twenty Thousand Dollars ($20,000.00) had flowed through the Committee's account without the knowledge of the other Committee members. Mr. Getty also made several recommendations to the Committee as to how it should proceed. The Federal Election Commission reports and letters, and analysis thereof prepared by Mr. Getty, are attached hereto as Exhibit B.

The total Committee reconvened, and a Motion was made by Mr. Getty that Chairperson Hornberger prepare a written and signed statement that details the nature and reasons for the activity that occurred in the Federal Account without the knowledge of the full Committee, and this report be presented to the Committee at its next regularly scheduled meeting on May 4, 1989, and that the report include a general description of the following matters: (a) The source of receipts that came from outside of Carroll County. (b) The nature of the expenditures that were made outside of Carroll County. (c) The people who were involved in making decisions about this activity. (d) The reason why such activity took place. (e) The fact that this activity was concealed from the majority of the members of the Carroll County Republican Central Committee, stating by name those members who were not knowledgeable about this activity. This motion was seconded by Mr. Wiser, and approved by a majority of the Committee voting five (5) to zero (0) in favor of the motion, with two (2) abstentions.

Mr. Wiser made a Motion that there be an immediate transfer of all accounts, ledgers, books, invoices, receipt and disbursement records, and other papers relating to the activity of this account to he, Federal Account Treasurer, and that he should proceed immediately with contacting the Federal Election Commission to resolve any open matters in reports prepared and

submitted to the Commission on behalf of the Committee; and further, that if these items are not met to our satisfaction, that the Committee file a Complaint with a request for audit to the Federal Elections Commission. This motion was seconded by Mr. Coleman, and was unanimously approved by the Committee.

The meeting was adjourned at approximately 10:45 p.m.

Frank D. Coleman, Secretary

2004031153

ATTACHMENT 5

April 27, 1989

Carroll County Republican
Central Committee
P.O. Box 2108
Westminster, Maryland 21157

This letter is intended as a written response from the undersigned Chairperson to certain questions which arose during the Special Meeting of the Carroll County Republican Central Committee on April 18, 1989.

In March of 1988, I was contacted by Mr. Richard Taylor, National Committeeman for the State of Maryland and Finance Chairman of Victory '88 for the State, regarding the need to use county federal committee accounts to receive contributions for the Victory '88 campaign in Maryland from individuals who supported the Republican Campaign efforts, but not necessarily the State Republican Party.

I then discussed this with Congresswoman Helen D. Bentley, who also was serving as both Chairwoman of the Victory '88 and the Bush Campaigns in this State. My first inquiry concerned the legality of such use. I was assured by both Chairwoman Bentley and National Committeeman Taylor that such use was legal and was a formula that had been practiced in Maryland during the Presidential elections in 1980 and 1984, and would again be used throughout the country in the current 1988 cycle.

Upon pursuing further information, I learned that the contributions would principally come from individuals and partnerships, some of whom did not want to appear on the State GOP contributor's list since some were expected to be prominent Democrats. I was told that this practice of disbursing receipts allowed flexibility. It was also hoped that this would keep the Dukakis forces from readily ascertaining the financial strength of the Bush Campaign and make it more difficult for the Dukakis forces to readily second guess what was happening in Maryland. All of us knew that the Maryland Victory '88 was in need of funds and that the race in Maryland would be very close.

It was my desire to do all that I could, within the bounds of the law, to help elect George Bush as President of the United States and assist the Republican Party.

2040-1-52

I discussed the request made of me with the Chairman of the Carroll County Bush Committee, Mr. Frank Rammes, and the Treasurer of the Carroll County Republican Central Committee Federal Account, Mr. Gary W. Bauer.

A decision had to be made as to whether a general discussion with members of the Carroll County Republican Central Committee would occur regarding the intended deposits. I was urged by Chairwoman Bentley not to discuss this matter with persons other than members of the Bush Committee and the Treasurer who was responsible under Federal law for the account. "Need to know" was cited as the basis for discussing the details with anyone outside of the campaign.

I had to make the decision. There were five (5) members of the Carroll County Republican Central Committee who were not members of the Bush Committee nor actively involved in the Presidential campaign. I chose not to engage in a general discussion with the Committee.

The Carroll County Republican Central Committee had a Federal Account in place at the time I was approached. Mr. Bauer felt that the incoming monies and outgoing expenditures could be separately accounted for and properly reported to the Federal Election Commission, as in fact they have been. An exchange of nine pieces of correspondence between the Federal Election Commission and Mr. Bauer indicate that ALL questions have been resolved with the exception of providing certain back-up material relating to local Republican clubs. One club is still behind in giving us the necessary letter. The suggestion that the current status of the reports "contain a number of unresolved matters pending before the Federal Election Commission" is simply NOT accurate.

The campaign guidelines proved to be successful because the State of Maryland ended up in the Bush column (which no one on the national level outside of Maryland thought could happen), and Carroll County led the State with a 72% Bush vote.

I render the above to the best of my memory and with the information that I gathered. I am hopeful that this matter is now closed.

Submitted,

Chairperson

2004081171

ATTACHMENT 6

Carroll County Republican Central Committee
Minutes for May 4, 1989

to be forthcoming

4031172

ATTACHMENT 7

Questions Regarding the Use of the Carroll County Republican Central Committee Federal Account During the 1988 Presidental Campaign

Submitted to Sharon W. Hornberger, Chairperson
Carroll County Republican Central Committee
May 8, 1989

A. THE SOURCE OF RECEIPTS THAT CAME FROM OUTSIDE OF CARROLL COUNTY.

1. In the FEC letter of February 8, Mr. Hageman expressed a concern about the number of "Information Requested" entries on the employer blank of the FEC forms. The federal code requires that the committee must exercise "best efforts" to obtain this information, either by a written request or by an oral request documented in writing. Please describe specifically how this information was requested and documented.

2. The FEC letter also requests a copy of our solicitation for employer information or an explanation of the method used to obtain contributor information. Has this been specifically addressed by you or Mr. Bauer in reports or letters to the FEC? Please tell us specifically how this matter was resolved to the satisfaction of the FEC?

3. Attached is a list of the contributors (Attachment A) from outside of Carroll County whose funds were deposited in the Carroll County Republican Central Committee Federal Account. The FEC requires the full name, mailing address, occupation, and name of employer. Please describe how this information has been documented? Please provide employer and occupation information for the contributors where this data is missing.

4. Who gave you the Victory '88 checks that were deposited into the Carroll County Republican Central Committee Federal Account?

5. The FEC code states that it is the responsibility of the Treasurer to deposit the monies in the account within 10 days. Please describe how you can document that these checks were deposited by Mr. Bauer within 10 days?

6. Were the contributors who wrote checks payable to "Victory '88" informed that their money would not go into the Victory '88 Fund? IN what way were they provided this information?

7. How were you able to deposit checks made payable to "Victory '88?" How were these checks endorsed?

8. Who added the initials CCRCFA to the payee line on the front of some of the checks originally made payable to "Victory '88?"

9. On November 14, we have a deposit of $5000 from the Drive Political Fund, 25 Louisiana Avenue NW, Washington, D.C. What is this organization? Explain why $5000 from this organization would be coming to Carroll County 11 days after the election?

10. On October 28, 1988, there is a receipt from the Bentley Re-Election Committee, Inc., for $1000. This $1000 is disbursed back to the same committee on November 11, 1988. Why was this done?

11. For the contributors from within Carroll County, you have stated that contributor identification data exists in the form of slips from the bottom of the solicitation letters that were returned with the contributions are available. Please provide these slips as well as ticket stubs or other materials that exist as documentation of all contributors to the Carroll County Republican Central Committee Federal Account.

B. THE NATURE OF THE EXPENDITURES THAT WERE MADE OUTSIDE OF CARROLL COUNTY.

12. In the FEC letter of February 8, Mr. Hageman requests data regarding administrative expenses. Where has this specifically been addressed by you or Mr. Bauer in reports or letters to the FEC. Please describe specifically how this matter was resolved to the satisfaction of the FEC?

13. Please provide in writing the details that you provided orally at the May 4 meeting about the specific reasons for the following expenditures:

12/14/88	Ambassador John Gavin Los Angeles, CA	travel exp.	$ 2012.
12/14/88	Admiral Limousine Service Alexandria, VA	travel exp. - Gavin	460.
12/30/88	Interna'l Limousine Service Baltimore, MD	travel exp. - Bentley	500.
12/15/88	Postmaster Westminster	postage	375.
11/7/88	Bentley Re-Election Comm. Towson, MD	(no purpose given)	1000.
1/27/89	Leslie Jacoby Parkville, MD	computer rental	2200.
1/27/89	Marge Newman Baltimore, MD	computer rental	1200.
2/7/89	Interna'l Limousine Service Baltimore, MD	travel	1000.
1/27/89	Leslie Jacoby Parkville, MD	computer rental	432.
2/9/89	Balt. Co. Victory Fund (same address as Marge Newman)	transfer	5000.
2/22/89	Freestate Victory Baltimore	transfer	5000.
4/14/89	Postmaster	—	1067.

14. The basis of your "need to know" secrecy is that all of this money worked to gain George Bush's election. The expenditures listed above do not appear to have much relevance to the actual campaign. Please tell us specifically how, in your view, this money was used to support George Bush's election in Maryland.

15. Why do the Federal Account Treasurer's books include copies of invoices for most disbursements, but do not include copies of invoices for the computer rentals?

16. Why are the two computer rental checks on January 27 in someone else's handwriting than Federal Account Treasurer Gary Bauer's?

17. Describe in detail the services provided by Leslie Jacoby for which she received $2200 on 1/27 and $432 on 2/7.

18. Describe in detail the services provided by Marge Neuman for which she received $1200 on 1/27.

19. What is the Baltimore County Victory Fund? Who is involved with this fund? Why were funds transferred into their account? How will this money be used?

20. What is the Freestate Victory Fund? Who is involved with this fund? Why were funds transferred into their account? How will this money be used?

21. Marge Neuman, who received payments for the computer rentals, has the same address as the Baltimore County Victory Fund. Please explain the relationship here?

22. On February 9, a check was written to the Baltimore County Victory Fund for $5533.72. Why was this for an odd amount?

23. The FEC reports show this check to be $5000. Why?

24. How will the postage purchased on April 14 be used?

C. THE PEOPLE WHO WERE INVOLVED IN MAKING DECISIONS ABOUT THIS ACTIVITY.

25. You and Frank Rammes have both said that when asked to participate in this diversion of campaign funds, your first question was to ask if it was legal? Why?

26. What was the structure of the state Bush committee and of the Victory '88 Federal Account?

27. Who assumed the authority to say which checks went where?

28. Under what organizational mandate did they have that authority?

29. The statement of organization as amended and submitted to the FEC by Mr. Bauer states that our Federal Account is the account for the Carroll County Republican Central Committee. While the treasurer is responsible for the administration of the account, the entire committee is liable should any violations be found. How do you justify keeping the knowledge of the diversion of funds secret from the majority of the committee members?

30. Once you started filing reports, there were several concerns raised about the account, including one letter that requires a written response within 15 days or the FEC may choose to initiate audit or legal enforcement action. The full committee was not made aware that concerns existed outside of the $4005 receipts from the Carroll County Republican Clubs. How do you justify keeping the FEC reports secret from us and the fact that letters were received from the FEC threatening an audit or legal enforcement?

31. Some of the committee members expressed concerns about Mr. Bauer's Treasurer's report on the Crab Feed at our meeting of September 22, 1988. Following that meeting, Mr. Getty sent a memo (dated September 28, 1988) to you and all of the Committee members requesting written treasurer's reports that identify all activity in the accounts (memo attached as Attachment B). This memo requests "a written report of the total activity in the Federal account." There is nothing in this memo that states that we wanted to receive only Carroll County money. It states that we should receive all activity in all of the accounts. In response to this written request within a month of when you made your first deposits of state money, how can you justify keeping the Victory '88 money secret from the other committee members?

32. What was your's and Mr. Bauer's response to this memo?

33. On October 6, a report of all Federal Account activity was presented to the committee. Attached to that report was a cover letter written by Mr. Bauer that stated that it was a "comprehensive report of activities in all three accounts in the Federal Account." Again, this says nothing about it being a report restricted only to Carroll County funds. Don't you think that there was an implicit commitment to present similar reports on all activity at all future meetings?

34. Under what authority did you believe that you were operating when you made the decision to secretly divert campaign funds in the Federal Account of the Carroll County Republican Central Committee?

35. Where in the By-Laws does it give the Chairman unilateral authority to make decisions and then conceal them from the majority of the other members?

D. THE REASONS WHY SUCH ACTIVITY TOOK PLACE.

36. Why was Carroll County chosen as a conduit for these funds?

37. You have stated that the early date of establishment of the Central Committee Federal Account provided greater flexibility than other counties. Can you describe this reasoning in detail?

38. One reason given for the overall purpose of this diversion of funds in your written statement dated 4/27/89 is that "the contributions would principally come from individuals and partnerships, some of whom did not want to appear on the State GOP contributors list since some were expected to be prominent Democrats." Please identify which contributors on Attachment A are prominent Democrats.

39. You also state that this was done to receive funds from individuals who wish to support the Bush candidacy but not the State Party. Which of the people listed above expressed an interest in supporting the Bush candidacy but not the state party? How did you know who these people were?

40. Did these people request that their names not appear on the State GOP contributors list?

41. If these people did not request that their names not appear on the State GOP contributors list, who was making these decisions for them?

42. You have explained in your letter that "this would keep the Dukakis forces from readily ascertaining the financial strength of the Bush Campaign and make it more difficult for the Dukakis forces to readily second guess what was happening in Maryland." If the Bush campaign raised $400,000 in Maryland, and only $20,000 was diverted to the Carroll County account. exactly how did this strategy work to confuse the "Dukakis forces?"

43. The bulk of these funds were not deposited in the Carroll County account right around election day. There was no need after the election to confuse the Dukakis forces. Why couldn't this money have been deposited in the state GOP Victory '88 account?

44. In a Baltimore Sun article, Helen Bentley states that the reason these funds were diverted was to keep them out of the control of State Party Chairman, Dan Fleming, but this fact has never been a part of your explanation of this activity. Why?

45. At our April 18 meeting, you said that it was the decision and discretion of the Chair to use our Federal account for the state funds and to not inform the other members. You said that, "It did not seem that the State of Maryland should lose out or that George Bush should lose out. I did not want to see us lose money. It would be a real shame to lose the campaign because we could not have access of that money." Why would this money have not been contributed if there was no Carroll County account to receive it?

46. Do you really think that this money had any effect at all during the Presidential campaign of 1988?

47. The bank statements show that the account balances before the election were $3010 on September 7 and $4715 on October 12. After the election, the account balances were $15084 on November 9, $20432 on December 14, $16833 on January 11, and $13491 on February 2. Doesn't this give the appearance that these were left-over funds from the Bush campaign?

48. When you first told Mr. Wiser about the discrepancies in the account balances, you told him that there were four counties in all that were involved in the diversion of campaign funds. But when Mr. Wiser asked Mr. Richard Taylor at the April 18th meeting about the involvement of other counties, he replied that there were only two jurisdictions. Which were the other central committees involved in the diversion of campaign funds?

49. What was your motivation in chosing to participate in the diversion of funds from the Victory '88 Fund to the Federal Account of the Carroll County Republican Central Committee?

50. Do you now think that any of this activity was wrong?

E. THE FACT THAT THIS ACTIVITY WAS CONCEALED FROM THE MAJORITY OF MEMBERS OF THE CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE.

51. Please list the members of the Central Committee who were knowledgeable about this activity.

52. Please list the members of the Central Committee who were not knowledgeable about this activity.

53. Please sign your written answers as an addendum to your statement of April 27, 1989.

Attachment A

Contributor	Employer	Occupation
Daniel Oliver 3105 Woodley Road N.W. Washington, D.C. 20008		
Shaukat A. Ashai 11380 Heathertoe Lane Columbia, Maryland 21044		
Tariq Mohmood, M.D. 10701 Balantre Lane Potomac, Maryland 20854	Self	Physician
Parvez Shah, M.D. 4405 Dustin Road Burtonsville, Maryland 20866	Self	Physician
Ann McLaughlin 2918 Garfield Street N.W. Washington, D.C. 20008		
Ruth N. Kraus 10901 Juniper Road Kingsville, Maryland 21087		Housewife
Henry A. Rosenberg, Jr. Crown Central Petroleum P.O. Box 1168 Baltimore, Maryland 21203	Crown Central Petroleum	Executive
Lawrence Rachuba The De Chiaro-Rachuba Group 700 Fairmount Avenue Towson, Maryland 21204	De Chiaro-Rachuba Group	Executive
John B. Burcham, Jr. 6921 Nashville Road Lanham, Maryland 20706		
W. Dale Hess 3401 Fallston Road Fallston, Maryland 21047		Real Estate
Leone W. Hendrox 1100 Schucks Road Bel Air, Maryland 21014	Tudor Manor Partnership 23 Ellendale Street Bel Air, Maryland 21014	Lawyer
Jean M. Shannon 5811 Holton Lane Temple Hills, Maryland 20748		
Jayne H. Plank 10005 Frederick Avenue Kensington, Maryland 20895		

Ronald G. Alessi, Sr.
30 Oakway Road
Timonium, Maryland 21093
301-252-2241

Gordon Smith
13711 East Devonfield Drive
Baldwin, Maryland 21013

William R. Rothe
4000 Tunlaw Road, N.W. No. 507
Washington, D.C. 20007

Peter Zourdos
5101 River Road
Bethesda, Maryland 20816

June Abel
408 Scott Drive
Silver Spring, Maryland 20900

James P. Goldsmith
1512 Bolton Street
Baltimore, Maryland 21217

Andrew Manos
6905 Millwood Road
Bethesda, Maryland 20817

Kenneth Burke
103 Park Lane
Baltimore, Maryland 21210

Robert B. Barnhill
6607 Weymouth Court
Baltimore, Maryland 21212
301-377-5952

Joseph Payne
2004 Witherspoon Road
Baltimore, Maryland 21212

John J. Foster, Jr.
1510 Dulaney Valley Road
Lutherville, Maryland 21093

Attachment B

MEMO

TO: Sharon Hornberger, Chairperson
Carroll County Republican Central Committee

FROM: Joe Getty, Member

DATE: September 28, 1988

SUBJECT: Written Treasurer's Reports

At the last meeting, there was considerable confusion about both Treasurers' Reports. I would like to suggest that at the October 3 meeting, the Treasurers' Reports be submitted in writing and that this practice be continued, especially during campaign periods when activity in the accounts is high.

These reports should contain a list of revenues in the catagories (ticket sales, contributions, etc.) as required by the state or federal reporting procedures. The report should also include a itemized list of expenditures made from the account.

Also, to help in clarifying some of the questions at the last meeting, it would be good to have a written report on the total activity in the Federal account (including all subgroupings of this account, i.e. Bush, Keyes, and general) this year, in addition to the September monthly report. If there is insufficient time to prepare such a report, perhaps a review of the Federal account books during the course of the meeting would be in order.

As a sample, attached is a copy of the type of report that I prepared during the last election campaign. I do not expect anything this elaborate, but I do feel that the committee needs to know item-by-item how the money is being spent.

cc: Central Committee Members
Gary Bauer, Federal Account Treasurer

ATTACHMENT 8

May 20, 1989

Carroll County Republican
Central Committee
Mr. Frank D. Coleman, Secretary
400 Baldwin Park Drive # B-2
Westminster, Maryland 21157

Re: Questions Regarding the Use of the Carroll County Republican Central Committee Federal Account During the 1988 Presidential Campaign

Dear Mr. Secretary:

I acknowledge receipt of your letter to me of May 9, 1989, regarding the above matter.

On May 12, 1989, the Maryland State Republican Party Executive Committee met in Ocean City, Maryland, and the issue of the investigation of the matters addressed in the above referenced questions was discussed. By Order of the State Executive Committee, the matter was referred to a committee to be appointed by the Chairman of the Maryland State Republican Party, Daniel Fleming, and is to be handled at the State level. It was specifically stated by Mr. Fleming as Chairman, that the only issue left to the local Central Committees involved, should they wish to pursue it, is what disclosure was made to individual members of the respective Central Committees.

Upon review of the submitted questions, I find that I have previously answered all matters regarding disclosure to individual members of this Committee, both orally and in writing. Following the State Party directive as above stated, I submit to you my prior written statement as answer to the sole question of disclosure to the individual members and shall, in the future, not further address this issue to this Committee.

Submitted,

/s/

Sharon W. Hornberger
Chairperson

cc: Joseph Getty
Donald Taylor
Edwin Rash
Louis E. Wiser, Jr.
Frank Rammes

Attachment 8 Analysis of Checks from Contributors Outside of Carroll County
Whose Funds Were Deposited in the Carroll County Republican Central Committee Federal Account

Contributor	Employer	Occupation	Check Payee	Date/Check	Date/Deposit	Amount
Daniel Oliver 3105 Woodley Road N.W. Washington, D.C. 20008			Victory '88 [CCRCCFA]	9/23/88	11/2/88	$ 1000.
Shaukat A. Ashai 11380 Heathertoe Lane Columbia, Maryland 21044 301-730-5943			Victory '88 [CCRCCFA]	10/11/88	scratched off 11/2/88 deposit slip? reported to FEC.	1000. ?
Tariq Mohmood, M.D. 10701 Balantre Lane Potomac, Maryland 20854	Self	Physician	Victory '88 [CCRCCFA]	10/11/88	11/2/88	1000.
Parvez Shah, M.D. 4405 Dustin Road Burtonsville, Maryland 20866	Self	Physician	Victory '88 [CCRCCFA]	10/12/88	11/2/88	1000.
Ann McLaughlin 2918 Garfield Street N.W. Washington, D.C. 20008			Victory '88 [CCRCCFA]	10/17/88	11/2/88	1000.
Ruth N. Kraus 10901 Juniper Road Kingsville, Maryland 21087		Housewife	C.C.R.C.F.A. - 88	10/23/88	11/2/88	1000.
Henry A. Rosenberg, Jr. Crown Central Petroleum P.O. Box 1168 Baltimore, Maryland 21203	Crown Central Petroleum	Executive	Victory '88	10/24/88	10/29/88	1000.
Lawrence Rachuba The De Chiaro-Rachuba Group 700 Fairmount Avenue Towson, Maryland 21204	The De Chiaro-Rachuba Group	Executive	C.C.R.C.F.A. - '88	10/25/88	11/2/88	1000.

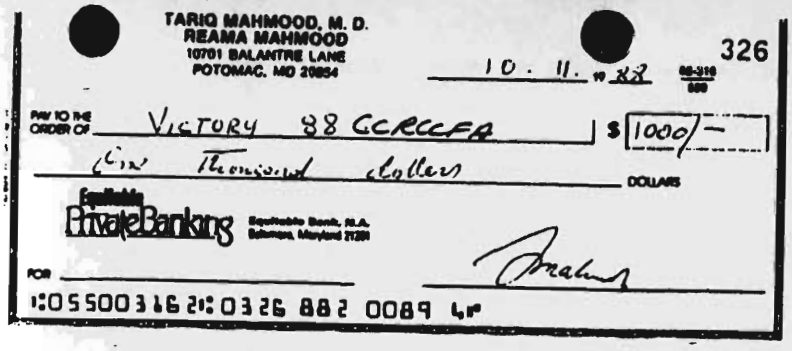
ATTACHMENT 9

John B. Burcham, Jr. 6921 Nashville Road Lanham, Maryland 20706			CCRCFA -88	10/24/88	10/29/88	1000.
W. Dale Hess 3401 Fallston Road Fallston, Maryland 21047		Real Estate	C.C.R.C.FA - 88	10/26/88	10/29/88	1000.
Leone W. Hendrox 1100 Schucks Road Bel Air, Maryland 21014	Tudor Manor Partnership 23 Ellendale Street Bel Air, Maryland 21014	Lawyer	C.C.R.C.F.A. - '88	11/7/88	11/14/88	2000.
Jean M. Shannon 5811 Holton Lane Temple Hills, Maryland 20748			CCRCFA 88	10/27/88	11/2/88	250.
Jayne H. Plank 10005 Frederick Avenue Kensington, Maryland 20895			FS Victory '88	10/ /88	10/29/88	500.
Ronald G. Alessi, Sr. 30 Oakway Road Timonium, Maryland 21093 301-252-2241			CCRCFA - 88	11/7/88	11/14/88	500.
Gordon Smith 13711 East Devonfield Drive Baldwin, Maryland 21013			Victory '88	10/21/88	10/29/88	200.
William R. Rothe 4000 Tunlaw Road, N.W. No. 507 Washington, D.C. 20007			Victory '88	10/23/88	10/29/88	200.
Peter Zourdos 5101 River Road Bethesda, Maryland 20816			Victory '88 [CCRCCFA]	10/15/88	11/2/88	100.

June Abel 408 Scott Drive Silver Spring, Maryland 20900	Victory '88 [CCRCCFA]	9/24/88	11/2/88	100.
James P. Goldsmith 1512 Bolton Street Baltimore, Maryland 21217	Victory '88 [CCRCCFA]	10/7/88	11/2/88	150.
Andrew Manos 6905 Millwood Road Bethesda, Maryland 20817	Victory '88 [CCRCCFA]	10/15/88	11/2/88	100.
Kenneth Burke 103 Park Lane Baltimore, Maryland 21210	Victory '88 [CCRCCFA]	10/6/88	11/2/88	100.
Robert B. Barnhill 6607 Weymouth Court Baltimore, Maryland 21212 301-377-5952	Victory '88 [CCRCCFA]	10/1/88	11/2/88	100.
Joseph Payne 2004 Witherspoon Road Baltimore, Maryland 21212	Victory '88 [CCRCCFA]	9/23/88	11/2/88	200.
John J. Foster, Jr. 1510 Dulaney Valley Road Lutherville, Maryland 21093	Victory '88 [CCRCCFA]	10/ /88	11/2/88	200.

Transfers from Federal Accounts

Drive Political Fund 25 Louisiana Ave., N.W. Washington, D. C. 20001	C.C.R.C.F.A. - '88	10/31/88	11/14/88	5000.
Bently Re-Elect Committee Inc. 88 P.O. Box 10619 Towson, Maryland 21285	CCRCFA - 88	10/28/88	11/2/88	1000.



TARIQ MAHMOOD, M. D.
REAMA MAHMOOD
10701 BALANTRE LANE
POTOMAC, MD 20854

326

10. 11. 19 88

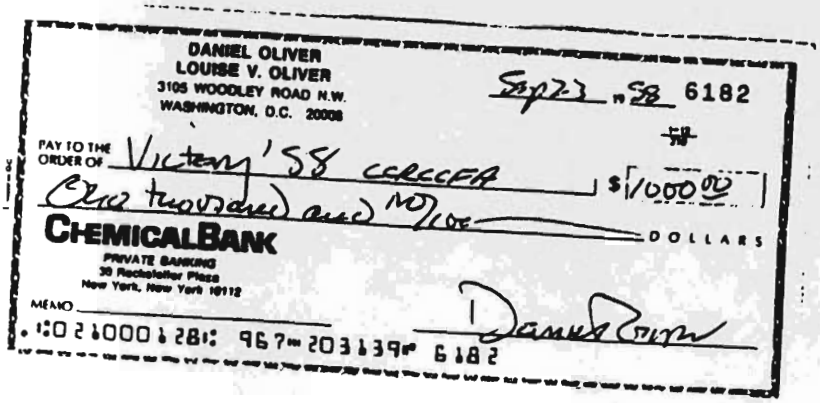
PAY TO THE ORDER OF Victory 88 CCRCCFA $ 1000/-

One Thousand dollars DOLLARS

Equitable Private Banking Equitable Bank, N.A. Baltimore, Maryland 21201

FOR

:055003162: 0326 882 0089 4#



DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 88 6182

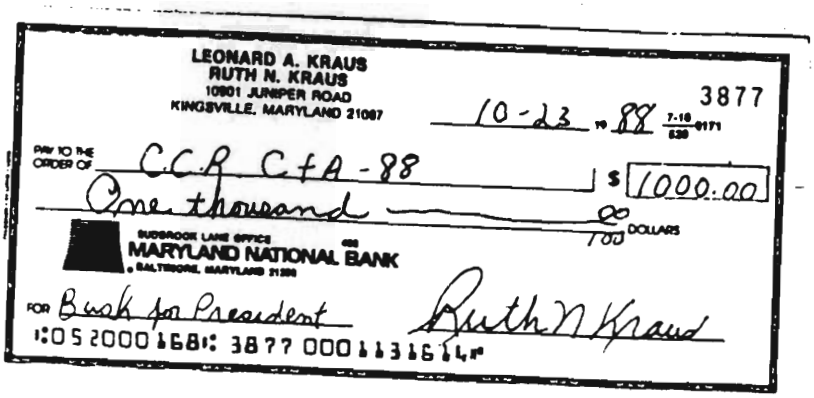
PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One thousand and NO/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO

:021000128: 967 203139# 6182



LEONARD A. KRAUS
RUTH N. KRAUS
10901 JUNIPER ROAD
KINGSVILLE, MARYLAND 21087

3877

10-23 19 88 7-10/530 0171

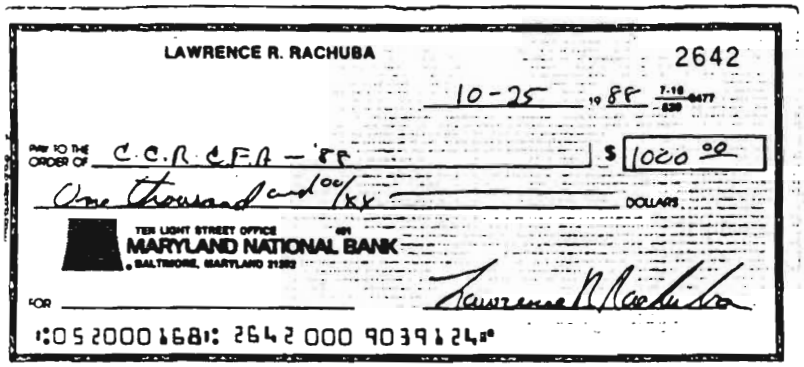
PAY TO THE ORDER OF C.C.R C+A-88 $ 1000.00

One thousand 00/100 DOLLARS

RUSSROOK LANE OFFICE 480
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21286

FOR Book for President

:052000168: 3877 000 11316 14#



LAWRENCE R. RACHUBA

2642

10-25 19 88 7-10/530 0477

PAY TO THE ORDER OF C.C.R C.F.A - 88 $ 1000 00

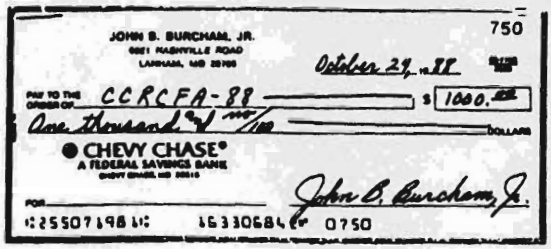
One Thousand and 00/xx DOLLARS

TEN LIGHT STREET OFFICE 491
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR

:052000168: 2642 000 90391 24#

P000401111135



JOHN B. BURCHAM, JR.
6821 NASHVILLE ROAD
LANHAM, MD 20706

750

October 24, 88

PAY TO THE ORDER OF CCRCFA-88 $ 1000.00

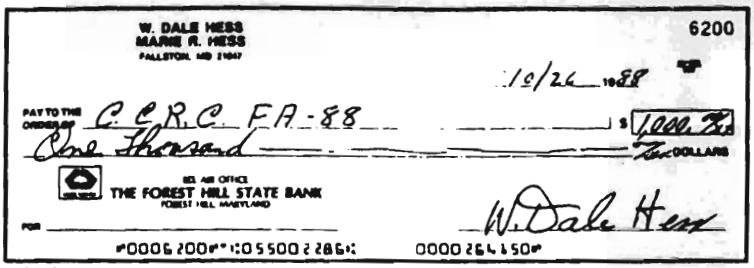
One thousand & no/100 DOLLARS

CHEVY CHASE®
A FEDERAL SAVINGS BANK
CHEVY CHASE, MD 20815

FOR

John B. Burcham, Jr.

:255071981: 1633068 0750



W. DALE HESS
MARIE R. HESS
FALLSTON, MD 21047

6200

10/26 1988

PAY TO THE ORDER OF C.C.R.C. FA-88 $ 1,000.00

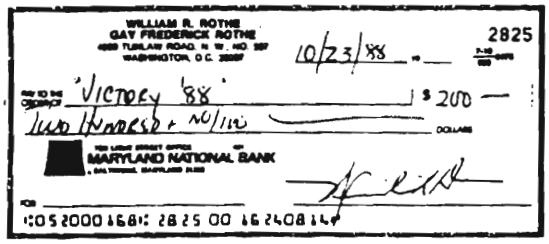
One Thousand DOLLARS

THE FOREST HILL STATE BANK
FOREST HILL, MARYLAND

FOR

W. Dale Hess

#0006200# :055002286: 0000264150#



WILLIAM R. ROTHE
GAY FREDERICK ROTHE
4939 TUNLAW ROAD, N. W., NO. 307
WASHINGTON, D.C. 20007

2825

10/23/88

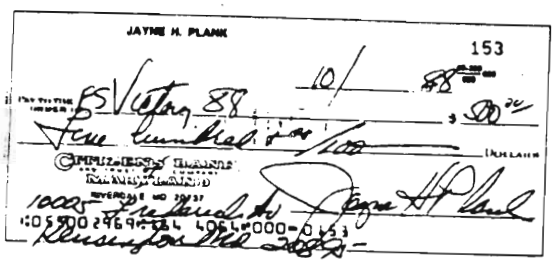
PAY TO THE ORDER OF Victory '88 $ 200.00

Two Hundred + NO/100 DOLLARS

MARYLAND NATIONAL BANK

FOR

:052000168: 2825 00 16 2408 14#



JAYNE H. PLANK

153

10/ 88

PAY TO THE ORDER OF Victory 88 $ 200.00

Two hundred & no/100 DOLLARS

COMMUNITY BANKS
RIVERDALE, MD 20737

1000 Returned to Payee H. Plank

:055002469: 4061#000-0153

Kensington Md 20895

3 0 0 4 0 3 1 1 1 3 6

PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816

2369

10/15 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100

ONE HUNDRED — AND — NO DOLLARS

Citizens Bank Of Maryland

MEMO

:055002969: 280 2804 500 2369

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 19 88

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

:054000522: 01 10249268 92765

PARVEZ SHAH, M.D.
BIRJEES SHAH
4406 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 19 88

Pay to the Order of Victory 88 CCRCCFA $ 1,000.00

One Thousand 00/100 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

:055000770: 1272 000294066

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL. 301-730-5943
11380 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11 19 88 7-10/530 1270

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 1000.00

One Thousand —— 00/100 DOLLARS

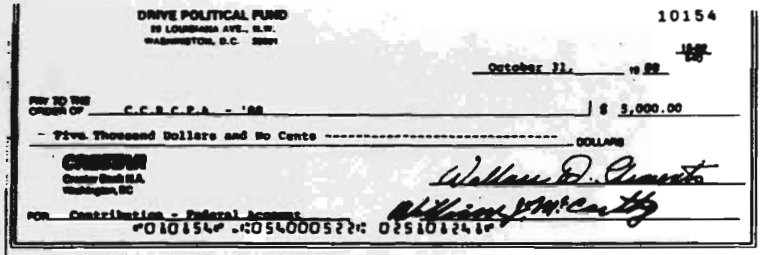
COLUMBIA OFFICE 201
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Electronic Credit Deposit

:052000168: 0735 00 7894 7108

---

2 0 4 0 3 1 1 1 3 7



DRIVE POLITICAL FUND
20 LOUISIANA AVE., N.W.
WASHINGTON, D.C. 20001

10154

October 21, 19 88

PAY TO THE ORDER OF C.C.R.C.F.A. - '88 $ 5,000.00

Five Thousand Dollars and No Cents ---------- DOLLARS

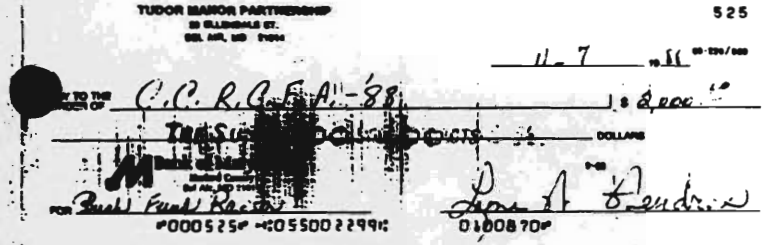
CRESTAR
Crestar Bank N.A.
Washington, DC

William D. Clements

William J. McCarthy

FOR Contribution - Federal Account

⑈010154⑈ ⑆054000522⑆ 025101246⑈



TUDOR MANOR PARTNERSHIP
20 ELLERSLIE ST.
BEL AIR, MD 21014

525

11-7 19 88 80-230/550

PAY TO THE ORDER OF C.C.R.C.F.A.-88 $ 2,000.00

Two Thousand and 00/100 DOLLARS

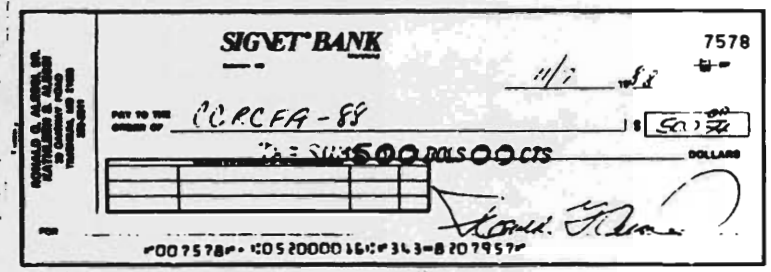
[redacted]

Bush Fund Raising

FOR Bush Fund Raising

Lynn A. Landrum

⑈000525⑈ ⑆055002299⑆ 01008 70⑈



SIGNET BANK
Signet

7578

11/7 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 500.00

Five Hundred DOLLS 00 CTS DOLLARS

RONALD G. ALBERTS
ESTHER M. ALBERTS
20 CHARLES ROAD
TOWSON, MD 21204

FOR

Ronald G. Alberts

⑈007578⑈ ⑆052000166⑆ 343-820795⑈

900408111138

LEONARD L. ABEL c/p
JUNE K. ABEL
408 Scott Dr.
Silver Spring, Md 20904

817

September 24 19 85 65-223/550 01

PAY TO THE ORDER OF Victory 85 CCRCCFA $ 100.00

One hundred DOLLARS

Montgomery County Bank

FOR

L. Abel

⑈000817⑈ ⑆055002236⑆ 01⑈007335⑈06⑈

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST
BALTIMORE, MARYLAND 21217

1933

10-7 19 88 05-40/521 010

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 150.00

one hundred fifty DOLLARS

First National Bank of Maryland
TOWSON, MARYLAND ACCOUNTING CENTER

FOR

James P. Goldsmith

⑆052100408⑆ 059⑈0270 8⑈ 1933

AMERICAN EXPRESS MONEY ORDER

Pentagon Federal Credit Union 04-388,304,036
Box 1432 — Arlington, Virginia 22313

PAY THE SUM OF NOT GOOD OVER $1,000

ONE SUM 250 DOLS 00 CENTS

Oct 27 19 88

CCRCFA 88

Lawrence M Shannon 5811 Halford Ln Temple Hills, Md 20748
ORDER'S NAME AND ADDRESS & JOHN W.

BEFORE CASHING READ NOTICE ON BACK

Issued by American Express
Travel Related Services Company, Inc.
Englewood, Colorado

Payable at
Valley Bank of Grand Junction
Grand Junction, Colorado

⑆102100400⑆04 ⑈388304036⑆

ANDREW MANOS
6908 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

OCT 10 1988

5231

10-15 19 88 $ 05-234/000

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

One hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR

Andrew Manos

⑆055002346⑆ 42 6242 2⑈ 5231

⑆102100400⑆ 139

KENNETH J. BURKE
103 PARK LANE
BALTIMORE, MD 21210

10/[redacted]88 0190

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100.00

One Hundred and 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO _____

[redacted]

:052000168:0190 000 [redacted]

ROBERT B. OR MARGARET K. BARNHILL
9607 WEYMOUTH COURT PH 301-377-6662
BALTIMORE, MD 21212

1811

10-1 1988

Pay to the Order of Victory 88 CCRCCFA $ 100.00

One hundred and 00/100 Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For _____

[redacted]

:053200019:18[redacted]32 [redacted]

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21203

FOR Early for President

Joseph and Susan Payne

:052000168: 0551000 [redacted]

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

[redacted]

:052000016: [redacted] 0631

[redacted]

DEPOSIT TICKET

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 3100
WESTMINSTER, MD 21157

DATE 11-2 19 88

CURRENCY		
COIN		
CHECKS	745	1000 00
TOTAL ITEMS		
TOTAL	1000	00

Western National Bank
CONVENIENCE, MARYLAND 21157

#001858# :055000615: #1070106 2#

GORDON L. SMITH
BARBARA SMITH
13711 EAST DEVONFIELD DRIVE
BALDWIN, MARYLAND 21013

3848

October 41 19 88 7-60 550

PAY TO THE ORDER OF Victory '88 $ 200.00

Two Hundred and 00/100 DOLLARS

Equitable Catonsville Bank, N.A. Catonsville, Maryland

FOR Contribution

:055200089&: 3848 798 0088 7#

BENTLY RE-ELECT COMMITTEE SEC. 88
P.O. BOX 1090
TOWSON, MD 21204

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA - 88 $ 1000 00

One Thousand Dollars

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
200 WEST BALTIMORE STREET
BALTIMORE-TOWSON, MARYLAND 21203

FOR Check Contribution Pardner Expenditure Margaret E. Bentley

#0000 1078# :055200061&: #6 25729 1#

SIGNET BANK
Maryland

2759

Oct. 24 19 88

PAY TO THE ORDER OF Victory '88 $ 1,000.00

One thousand and 00/100 DOLLARS

FOR

#00 2759# :055200016&: #306-07956#

ATTACHMENT 10

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

May 12, 1989

Mrs. Mary M. Rose
126 River Drive
Annapolis, Maryland 21403

Dear Mrs. Rose:

Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.

Weeks passed without any acknowledgement from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My check appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. (I have enclosed a copy of the front and back of the check: but as always, the back, including the date it was deposited, is a bit hard to read.) And the funds were deposited in a Maryland bank.

What I want to know is, what happened? And who did it? And why? What is "CCRCCFA?" Is "Victory '88" the same organization as "Victory '88 CCRCCFA." And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

I know you will want to clear up these matter, and do so sufficiently publicly to reassure people who might otherwise be discouraged from making contributions in the future.

Sincerely,

Daniel Oliver

DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 '88 6182

PAY TO THE ORDER OF Victory '88 CCRECEA $ 1000.00

One thousand and NO/100 DOLLARS

CHEMICAL BANK
PRIVATE Banking
20 Rockefeller Plaza
New York, New York 10112

MEMO 707

Daniel Oliver

⑆021000128⑆ 967-203139⑈ 6182 ⑈0000100000⑈

NO ▶ 02
FNB OF MD
052000113

NO '88 03
CHEMICAL BANK
N.Y.C. N.Y.

107-0101-2

ATTACHMENT 11

Letter from John Burcham
Contributor to the CCRCC Federal Account

to be forthcoming

20040311124

ATTACHMENT 12

MEMO

TO: Sharon Hornberger, Chairperson
Carroll County Republican Central Committee

FROM: Joe Getty, Member

DATE: September 28, 1988

SUBJECT: Written Treasurer's Reports

At the last meeting, there was considerable confusion about both Treasurers' Reports. I would like to suggest that at the October 3 meeting, the Treasurers' Reports be submitted in writing and that this practice be continued, especially during campaign periods when activity in the accounts is high.

These reports should contain a list of revenues in the catagories (ticket sales, contributions, etc.) as required by the state or federal reporting procedures. The report should also include a itemized list of expenditures made from the account.

Also, to help in clarifying some of the questions at the last meeting, it would be good to have a written report on the total activity in the Federal account (including all subgroupings of this account, i.e. Bush, Keyes, and general) this year, in addition to the September monthly report. If there is insufficient time to prepare such a report, perhaps a review of the Federal account books during the course of the meeting would be in order.

As a sample, attached is a copy of the type of report that I prepared during the last election campaign. I do not expect anything this elaborate, but I do feel that the committee needs to know item-by-item how the money is being spent.

cc: Central Committee Members
Gary Bauer, Federal Account Treasurer

MQC2912

MYERSON KUHN & STERRETT

Washington, DC
New York
Philadelphia
Dallas

Pre Mur 217

May 31, 1989

Hand Delivered

Mr. Larry Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

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

Dear Mr. Noble and Ms. Lerner:

Please find enclosed a signed Statement of Designation of Counsel from the treasurer of Alerted Democratic Majority PAC ("ADM"), authorizing us to represent the treasurer and ADM in all matters before the Federal Election Commission.

As we discussed during our meeting Thursday, ADM has recently learned that the individual who has had responsibility for maintaining ADM's accounts and preparing its reports had embezzled ADM's funds and prepared presumably inaccurate reports to conceal these activities. ADM's treasurer signed these reports in the belief that they were true, correct and complete to the best of his knowledge and belief.

Immediately upon discovering the embezzlement of PAC funds, counsel was retained and an audit of ADM's reports and bank account undertaken in order to determine the extent to which any reports filed with the Commission may have contained inaccurate information. Our meeting with you Thursday was for the express purpose of immediately informing the Office of General Counsel of ADM's efforts to determine the extent of any inaccuracies and ADM's intention to file amended reports with the Commission as soon as practicable.

1001 Pennsylvania Avenue
Washington, D.C. 20004
(202) 624-5900

Telecopier (202) 624-5904

MYERSON KUHN & STERRETT

Pursuant to our discussion with you, we understand the Commission will open a pre-MUR pending the submission of amended reports. Once the Commission has had an opportunity to review these amended filings, ADM and its treasurer desire to resolve any outstanding matters as quickly and fairly as possible.

Sincerely,

David M. Ifshin

2004038111997

STATEMENT OF DESIGNATION OF COUNSEL

Name of Counsel: David M. Ifshin

Address: Myerson Kuhn & Sterrett
1001 Pennsylvania Avenue, N.W.
Suite 275N
Washington, D.C. 20004

Telephone: (202) 624-5980

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

5/23/89
DATE

TREASURER

PAC Name: Alerted Democratic Majority PAC

Address: ~~14th Floor~~ Suite 1520 Packard Building
S.E. Corner 15th and Chestnut Streets
Philadelphia, Pennsylvania 19102

Telephone: (215) 665-3000 - 215-568-2888

2030411798

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

89 JUL 10 AM 11:49

Federal Account Treasurer
Carroll County Republican
Central Committee
2810 Gillis Street
Mt. Airy, Maryland 21771

June 29, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUL 10 PM 3:05

Office of General Counsel
Federal Elections Commission
999 E Street NW
Washington, D.C. 20463

Dear Sirs:

Enclosed is the additional data cited in the reports attached to our letter of May 25, 1989, regarding the Carroll County Republican Central Committee Federal Account (ID #C000232603).

This additional data includes the meeting minutes from the Committee's meeting of May 4, 1989, and a copy of the letter received from one of the contributors, John B. Burcham, Jr.

I have also enclosed copies of the newspaper articles that have appeared as a result of this issue.

Please let me know if there are additional materials necessary for you to complete your review.

Sincerely,

Louis E. Wiser, Jr.
Federal Account Treasurer

Enclosures

CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE
MINUTES FOR MAY 4, 1989

MEMBERS PRESENT: Sharon Hornberger, Don Taylor, Frank Coleman, Lou Wiser, Joe Getty, Frank Rammes, and Ed Rash.

Guests Present: Kitti Roarty, Parliamentarian for Maryland Federation of Republican Women; Sherri Lyons, Baltimore Morning Sun; Jordie Woodward, Carroll County Times; Gary Bauer.

The meeting was held at Mr. Coleman's office and was called to order at approximately 7:40 p.m..

OLD BUSINESS:

Secretary's Report: Minutes from April 6 and 18, 1989 were submitted by the Secretary. Regarding Minutes of April 6, amendment was noted that Sharon Hornberger and Joe Getty said they would consider running for the Central Committee in 1990. Regarding the Minutes of April 6 and April 18, it was noted that the reference to "Carroll County Republican Club" should be changed to "Carroll County Republican Central Committee." Also regarding the Minutes of April 18, Mr. Taylor questioned whether Congresswoman Bentley had made a remark about keeping funds away from Mr. Fleming, which neither Mr. Getty nor Ms. Hornberger, nor any other member of the Committee remembered. Regarding Minutes of April 6, a Motion was made by Mr. Wiser, which was seconded by Mr. Taylor, to approve the Minutes as amended, which motion was unanimously approved by the Committee. Regarding Minutes of April 18, a Motion was made by Mr. Rammes, which was seconded by Mr. Rash, to approve the Minutes as amended, which motion was unanimously approved by the Committee.

Treasurer's Report: Mr. Wiser reported that the balances in the accounts were the same as reported on April 6, 1989. Additional interest has been earned on the accounts, but not added to the figures because the bank statements have yet to be received. There has been no income received not disbursements made.

The following items were discussed and actions taken:

1. CCRCC Federal Account - Ms. Hornberger raised the question of whether the meeting should be open or held in executive session. The members expressed their willingness to have the meeting open. Ms. Hornberger then stated that she had mailed a written response to the Members per the motion passed at the special meeting held on April 18, 1989. That motion had requested Ms. Hornberger to prepare a written and signed statement detailing the nature and reasons for the activity that occurred in the Federal Account without the knowledge of the full Committee, including a general description of the following

matters: (a) The source of receipts that came from outside Carroll County. (b) The nature of the expenditures that were made outside Carroll County. (c) The people who were involved in making decisions about this activity. (d) The reason why such activity took place. (e) The fact that this activity was concealed from the majority of the members of the CCRCC, stating by name those members who were without knowledge of this activity.

Mr. Rammes made a Motion to accept Ms. Hornberger's response (attached hereto as Exhibit A) as submitted as fulfilling the request made by the Committee on April 18. This motion was seconded by Mr. Getty. After the following discussion, the motion was not approved by a vote of one (1) in favor of the motion to five (5) against.

Mr. Getty opened the discussion by stating that there was still some question about the source of receipts. He stated that these were monies that were to go to the State Party account, but came to the CCRCC account instead. He asked what was the solicitation that brought the funds in? Ms. Hornberger said they were receipts that Dick Taylor and Helen Bentley solicited on an individual basis. She noted that there was a fund raiser in Howard County at the home of Kingston Gould, a private cocktail reception, but did not know whether the funds came from solicitations made at this fund raiser or not.

Upon question by Mr. Getty, Ms. Hornberger said the contributors stated that they did not want their contributions to go to the State Party account when they were handed over. She acknowledged that it had been said that there were some prominent Democrats, and added as well as Republicans, who did not want to show support for the State Party, but were interested in contributing to the election of Mr. Bush. However, Ms. Hornberger did not know the party affiliation of a list of ten (10) contributors on one of the FEC reports. When it was noted that one was a prominent Republican, who serves on the State Party, she did not know the rational for why his contribution was put in the CCRCC account, or why he would not want to show support for the State Party. She also stated that she did not know whether any of the contributors on this particular list were prominent Democrats, or whether they made the statement that they did not want to show support for the State Party when they made their contribution.

Ms. Hornberger acknowledged that another reason given for depositing the funds in the CCRCC account was to confuse the Dukakis campaign officials about or conceal from them the Bush effort in Maryland. When asked how $20,000.00 of the approximately $400,000.00 spent for Bush in Maryland would do that, she said because Carroll County was not the only central committee with which this was done. In this regard, it was also pointed out that the bulk of the receipts were deposited right around election day. she said it would help regardless, and noted that some of the money had been promised earlier, but was received late; however, since it had been promised to the

contributors that their contribution would not go into the State Party account, the funds were handled as they were to keep this promise. It was also pointed out that at the end of the campaign there was a large infusion of money. Ms. Hornberger said that expenses had been incurred, and it was known that bills would be forthcoming for which this money would be needed.

Concerning the actual amount of money that flowed through the CCRCC account, Ms. Hornberger stated that she had informed Mr. Wiser that the figure was $20,000,00, and that he had asked if any of the money was still in the CCRCC account, to which she said yes, about $1,000.00. Mr. Wiser then said that he would not accept responsibility for the account.

Regarding expenditures of the monies that had flowed through the CCRCC account, Ms. Hornberger acknowledged that the expenditures were for the election of George Bush as President in the state of Maryland, and that every dollar was important. When asked about the expenditure for Ambassador Galvin's travel and limousine, she pointed out that he was brought to Maryland to be the guest of honor at Kingston Gould's home to draw contributions. When asked about the other limousine expenses noted in the FEC reports, she pointed out that this was for the renting of cars and buses to transport Bush Campaign workers to Washington for the Inauguration. When asked about the postage expense to the Westminster Post Office, she pointed out that was for the mailing of receipts and thank you cards to contributors. When asked about the $1,000.00 expenditure for the re-election of Ms. Bentley, she pointed out that Ms. Bentley's treasurer had make a mistake and sent this money in error for depositing in the CCRCC account, and that this was a contribution from Frank Purdue to her re-election. When asked about the computer rental expenses of $2,000.00, $1,000.00 and $432.00, she said that she has asked for time sheets for these individuals and invoices, that the $432.00 was spent for computer supplies, e.g., programs, disks, paper and ribbons, and that the other monies were spent for input of data and time on the computer, e.g., putting names and addresses on letters for mailing state wide. In this regard, Ms. Hornberger also pointed out that these funds were paid to individuals, who had PCs and had donated so much of their time that a decision was made to pay them for their effort at the rate of $6.00 per hour. When asked about an April 14, 1989, expenditure to the Postmaster of $1,067.00, she pointed out that this money was left in the account by Ms. Bentley, who said she wanted to make a state wide mailing, and thus, first class stamps were bought from Westminster.

A discussion was then held regarding whether the whole Committee was responsible for violations of FEC rules. Ms. Hornberger felt that Committee was not, just the treasurer for the account. Mr. Getty felt the Committee was responsible, as did Mr. Wiser.

When asked what was the "Baltimore County Victory Fund," Ms. Hornberger stated it was the federal account for the Baltimore County Central Committee. When asked what was the "Free State

Victory Fund," she stated it was the federal account for the Baltimore City Central Committee.

Regarding transfers out of the CCRCC account on or about February 9, 1989, Ms. Hornberger noted that initially $5,333.33 had been transferred to the accounts just mentioned, but that this was not proper as only $5,000.00 can be transferred between accounts, and thus, the checks were returned and $5,000.00 even was sent to each of these accounts. These transfers were done to remove these funds from the CCRCC account. She also stated that a computer and printer was purchased for Victory '88 out of the monies that were transferred into the other accounts. When asked why the funds weren't put in the State Party Victory '88 account to buy the computer, she stated because control of these funds would not be turned over to the State Party. Mr. Getty pointed out, however, that Victory '88 is the State Party. When asked if these funds were not State Party funds diverted to Carroll County to keep them out of Dan Flemings hands, Ms. Hornberger stated she would not answer this question as this is Bentley's statement.

Mr. Wiser noted from his examination of the account records that on September 7, 1988, $3,610.63 was in the account, on October 15, 1988, $4,715.95 was the balance, and on November 9, 1988, after the election, the balance was $15,084.76. He also noted that just days before the election, three (3) $1,000.00 contributions were deposited on October 29, 1988, and seven (7) $1,000.00 contributions were deposited on November 2, 1988. On November 14, 1988, there was a balance of $20,000.00 in the account, and additional funds had been deposited of $2,000.00 and $5,000.00 from a DIR partnership, which was not proper, and $500.00 from an individual contributor. Regarding disbursements, he noted that on December 14, 1988, $2,000.00 was paid to Ambassador Galvin, plus $400.00 for his limousine rental. On December 29, 1988, another $500.00 was paid for limousine rental, but there were no receipts. On January 23, 1989, there were two (2) disbursements of $2,200.00 and $1,200.00 for computer service, which checks were not in Gary Bauer's handwriting although signed by him. In this regard, Ms. Hornberger stated that she had filled in the names and amounts. Mr. Wiser continued that in February 1989, when the Committee was told that there was only $83.00 in the account, there was well over $15,000.00, and that the money was pumped out during the first part of February with the transfer of $5,000.00 each to the accounts in Baltimore County and City.

In reply, Ms. Hornberger stated that bills don't come in immediately for campaign expenses. When questioned whether these funds had really been spent on campaign expenses, she stated that the Committee's opinion of what is an appropriate effort to elect George Bush and that of Ms. Bentley and Dick Taylor may be different. She pointed out that these expenses were made for building the Republican Party in Maryland and there is no problem with the FEC regarding these expenses.

When questioned how the checks were endorsed that were made payable to Victory '88, Gary Bauer stated that he placed the CCRCC account number and name on them for depositing.

When questioned who added the letters "CCRCCFA" in different handwriting and ink than the maker of the check, Ms. Hornberger did not know. Mr. Bauer stated that he received the checks with this alteration having already been made.

Ms. Hornberger stated upon questioning that she had not discussed this situation with Nelson Warfield, and that the authorization to use the CCRCC account was requested in October by Dick Taylor. Mr. Donald Taylor of the Committee pointed out that there had been a prior question concerning the commingling of funds at the county level, and asked why did Ms. Hornberger think doing so in Carroll County would be acceptable. Ms. Hornberger stated that Mr. Dick Taylor and Ms. Bentley thought they could explain satisfactorily their reasons for taking this action, and then added, obviously, they were wrong. Ms. Hornberger acknowledged that she had exercised poor judgment, and that she had based her judgment to allow the CCRCC account to be used as it was upon the arguments presented to her by Dick Taylor and Ms. Bentley.

Question was called and a vote taken on the motion as aforesaid.

Motion was made by Mr. Coleman that the members who have additional questions that make Ms. Hornberger's letter of April 27, 1989, unacceptable should submit them to him for forwarding to Ms. Hornberger for a written response from her or some other appropriate official, which motion was seconded by Mr. Rammes, and unanimously approved by the Committee.

Motion was made by Mr. Getty that Mr. Wiser, the Committees Treasurer, close the Federal Account as soon as the FEC is satisfied that the account reporting is accurate and meets regulations. This motion was seconded by Mr. Wiser, and unanimously approved by the Committee.

2. Crab Feast - A letter was sent to all the clubs under signature of Don Taylor, Vice-Chairperson, requesting their selection of activities to sponsor at the Crab Feast on September 2, 1989.

3. Voter Registration - Mr. Rammes reported that the Republicans are only 464 members away from majority status in Carroll County. The voter registration courses are going very well. Regarding "Register to Vote" signs, it appears vinyl will be too expensive.

NEW BUSINESS:

The following items were discussed and actions taken:

1. Board of Election Supervisors - A letter dated April 28, 1989, was received by Ms. Hornberger stating that a committee had

been established by the Board to investigate voter systems. A representative from the Committee is needed to serve on this committee. Mr. Rash volunteered to serve. A Motion was made by Mr. Rammes for Mr. Rash to serve on this committee, which motion was seconded by Mr. Wiser, and unanimously approved by the Committee.

2. League of Women Voters - The League wishes to interview a member of the Committee in May 1989. It was decided that Ms. Hornberger would call and tell the League that someone would be available in June to be interviewed.

3. Sixth District Meeting - Mr. Taylor and Mr. Rash attended the Sixth District Committee meeting in April 1989. Mr. Taylor tendered a written report to be attached to the minutes, and which is attached hereto.

The meeting was adjourned very late.

Respectfully submitted,

Frank D. Coleman, Secretary

J J 4 0 3 1 1 2 3 5

6921 Nashville Rd.
Lanham, MD 20706

May 31, 1989

Daniel E. Fleming, Chairman
Maryland Republican Party
60 West Street, Suite 201
Annapolis, MD 21401

Dear Dan:

I read recently in the paper about the concern in the Maryland Republican Party over the use of some funds contributed to the Party. In reviewing some of the events over the past several months, I feel that I may be an innocent participant in this matter. Please let me explain. In order to do this, I need to highlight several events over the past year.

In the Spring of 1988, I supported Mary Rose for our National Committeewoman at a state convention....because she had announced early, campaigned hard, was totally competent and I felt we needed to spread responsibility. When she lost to Congresswoman Helen Bentley, I went to see Mrs. Bentley because I was concerned that she might feel that there were personal reasons I did not support her. There had also been an incident at the convention regarding one of our County delegates who repeatedly lied to me about carrying out the wishes of an instructed proxy. I explained to Mrs. Bentley my concern about a divided Republican Party and that I wanted to work for unity and cooperation among us.

At the Fall Convention, things seemed to be properly aimed at electing George Bush as president. Though I had run as a Robert Dole delegate in the Primary, I supported George Bush enthusiastically in the General Election.

While at the Fall Convention, Congresswoman Helen Bentley asked me to attend a fund-raising function several days hence at the home of Kingdom Gould, with Ambassador John Gavin and his wife as special guests. She told me to make out the check to CCRCFA-88 for $1,000. I understood the function to be a fund-raiser for George Bush.

At the function, Ambassador Gavin stressed his knowledge of and confidence in George Bush and urged us all to do all we could to assure his election in November. My wife and I certainly went away feeling that we had made a contribution to and had been at a function for the Bush campaign.

When the story broke later about the new division in the Republican Party because of the Willie Horton mailing, I decided to side with you unless and until there were tangible reasons to remove you from office. I was aware of some opportunists who were trying to use the event to make power grabs of their own at others' expense. Some of them worked on me quite hard. Others certainly may have opposed you for what they thought were legitimate reasons.

In early February of this year, I decided that I would resign as chairman of the Republican Central Committee for Prince George's County. I did this because our committee was operating in an environment of lies and deception on many issues. Several had expressed concern to me but did not desire to lead a fight against these problems. I had devoted twenty-one consecutive years of service to the Party at great personal and financial sacrifice, but could not work with some who would not be honest with me.

Subsequent to my resignation, I have heard numerous reports that Mrs. Bentley has told people that she is glad I left because I was an "obstructionist" and other negative descriptors. Though I have not discussed this information with Mrs. Bentley, which I have received second-hand, it concerns me greatly.

Though I might differ with people, I always have tried to work for the good of the team, which has to allow for differences with individuals on specific issues.

Back to my contribution--it was represented to me that I was contributing to the Bush Campaign. Since I now have many reasons to doubt that representation, I wish to know: What is/was CCRCFA-88? Was my money spent? If so, what for? If not, where is it now?

If I am not completely satisfied with the answers to these questions, then I want my money back as soon as possible!

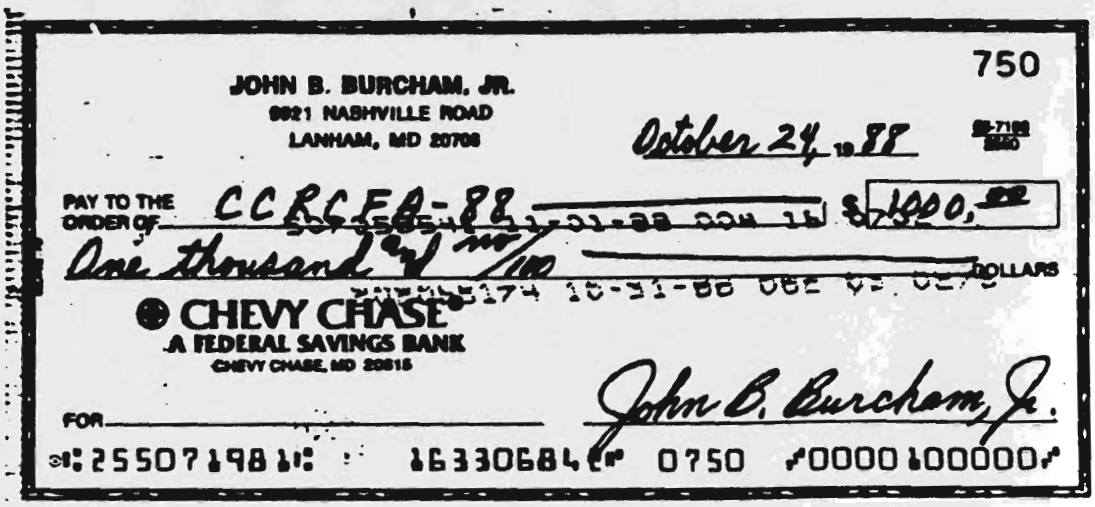
For your information, I am enclosing a copy of both sides of my canceled check.

Please resolve this matter at your earliest convenience.

Sincerely,

John

John B. Burcham, Jr.



JOHN B. BURCHAM, JR.
9921 NASHVILLE ROAD
LANHAM, MD 20706

750

October 24, 1988

PAY TO THE ORDER OF CCRCFB-88 $ 1000.00

One thousand and no/100 DOLLARS

CHEVY CHASE
A FEDERAL SAVINGS BANK
CHEVY CHASE, MD 20815

FOR

John B. Burcham, Jr.

:255071981: 1633068 0750 0000100000

0520-0027-6

NO 01

CHEVY CHASE

10?-0106-2

John Burcham

>0040811238

THE SUN
Maryland
SECTION B
SUNDAY, APRIL 30, 1989
B

Bentley kept shift of GOP funds secret to stymie Fleming

By Robert A. Erlandson
Baltimore County Bureau of The Sun

Representative Helen Delich Bentley, with the help of three local Republicans, secretly stashed about $20,000 in presidential campaign funds in the Carroll County Central Committee's federal account, in part to keep the money away from her party rival, state GOP Chairman Daniel E. Fleming.

Half of the money, which was transferred to the Carroll County account just before and after the November election, later was moved to similar accounts in Baltimore and Baltimore County. It was used for such campaign costs as air fares and limousines for guests at fund-raisers, and a computer and printer.

The transfer was legal, but the discovery that it was done secretly has led to a call for the resignation of two members of the Carroll County Central Committee, Chairwoman Sharon Hornberger and Frank Rammes, county chairman of President Bush's Victory '88 campaign.

The only other person in on the secret was Gary W. Bauer, who, though not a committee member, was treasurer of the federal account. He told the Central Committee that it contained as little as $87, though Federal Election Commission records show more than $20,000 was available at times.



HELEN DELICH BENTLEY
Denies having slush fund

Mrs. Bentley, R-Md.-2nd, who headed the Bush campaign in Maryland, said in an interview that the transfers had a dual purpose: to prevent the forces of Massachusetts Gov. Michael S. Dukakis, the Democratic nominee, from piecing together the GOP financial picture and to prevent Mr. Fleming from having

See **BENTLEY**, 10B, Col. 1

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Baltimore Sunday Sun 4/30/87

Bentley kept money shift secret to stymie Flemir

BENTLEY, from 1B

control of the money.

She said contributions came in during the rift in the GOP caused when Mr. Fleming sent out campaign literature implying that the release of William Horton Jr., a black convicted murderer who raped a white Maryland woman after escaping while on furlough from a Massachusetts prison, proved that Mr. Dukakis was soft on criminals.

Both Democrats and Republicans attacked the literature as racially inflammatory. Mrs. Bentley tried to oust Mr. Fleming as party chairman because of it, saying he represented the far right wing of the GOP while she represented mainstream Republicanism.

"It's part of the Fleming thing," Mrs. Bentley said. "I wasn't going to raise any money to go" to accounts controlled by the state GOP chairman.

Mr. Fleming, who was taken by surprise when he learned of the transfer earlier this month, said he thought Republican leaders had stopped shifting money to federal accounts separate from those maintained at party headquarters in Annapolis after he blocked a similar move last summer in Hagerstown.

"I assumed that all money from Victory '88 was deposited in Annapolis," Mr. Fleming said. "I had no clue any shenanigans were going on."

The state party is awaiting the results of a Carroll County Central Committee investigation and will conduct its own probe, he said.

Ms. Hornberger, an aide to state Sen. Raymond E. Beck, R-Carroll, initially refused to discuss the dispute. She later admitted that she agreed to cooperate when Mrs. Bentley asked her to be a conduit for the money and to disclose it only on a "need to know" basis.

Mrs. Bentley said she set the "need to know" policy along with Richard P. Taylor, the GOP national committeeman and Bush finance chairman in Maryland, where $400,000 was raised for Mr. Bush.

"In a campaign, when you're working on things, you don't want to tell everyone," Mrs. Bentley said. "There are things in my own campaign I don't tell everyone."

She conceded, however, that "there were probably some errors made" in hiding it from Carroll County Central Committee members.

The Carroll County account was chosen, even though the county is not in Mrs. Bentley's congressional district, because it had been established earlier in 1988 than its counterparts in Baltimore and in Baltimore County.

"You have more flexibility with an older account, and we were operating a full-speed election," Mrs. Bentley said.

The secret transfers surfaced earlier this month after members of the Central Committee were rebuffed when they tried to close the account because they thought it had so little money that filing FEC reports was a waste of energy.

Ms. Hornberger finally admitted to one member that there was more money than they had been told about and asked him to keep it quiet. But he refused and told committee member Joseph M. Getty, who verified the amount in the account through FEC reports.

Mr. Getty has submitted recommendations to fellow members seeking the resignations of Ms. Hornberger and Mr. Rammes from the committee or their expulsion from the party. Mr. Bauer already has been removed as treasurer of the federal account.

"The fraudulent actions and lack of sensible judgment shown by the members involved in this activity casts a deep shadow over the integrity of this committee," Mr. Getty said.

The law does not provide for removal of members or punitive actions against committee members, Mr. Getty acknowledged, but he suggested that "the members who engaged in fraudulent activity ...

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should take it upon themselves personally to resign from the committee."

Mr. Getty recommended that if Ms. Hornberger and Mr. Rammes refuse to resign — both declined to discuss that possibility — the Central Committee send a motion to the state GOP to expel them at the spring party convention May 12-13.

After the money transfers were revealed, the Central Committee members made a pact of public silence until after the next meeting, May 4, when Ms. Hornberger's explanation was to be given.

However, some members eventually agreed to talk when The Sun got word of the transfer and verified it through FEC reports.

Ms. Hornberger said Mrs. Bentley and Mr. Taylor assured him that the money transfer was legal, that it had been done in Maryland in the 1980 and 1984 presidential campaigns and that it would be done nationwide in the 1988 race.

"I was told this practice of distributing receipts allowed flexibility," Ms. Hornberger said. "It was hoped it would keep the Dukakis forces from readily ascertaining the financial strength of the Bush campaign and Victory '88 and make it more difficult for the Dukakis forces to second-guess what was happening in Maryland."

"It was my desire to do all in my power within the law to help elect George Bush and assist the Republican Party," said Ms. Hornberger, who was elected 4-3 over Mr. Getty in December to chair the Central Committee and reportedly has political ambitions.

"I had knowledge of it, but it was legally raised, and since we have been having other [internal] problems, we didn't feel it necessary to make it known to the others," Mr. Rammes said.

Mrs. Bentley denied that the account was a slush fund. "How can it be a slush fund when everything was duly reported?" she said.

An FEC spokesman said transferring federal-account funds is permitted under the law as long as it is disclosed, as was done in this case.

About half of the money was transferred quietly from Carroll County to similar accounts in Baltimore and Baltimore County and used to pay various campaign expenses, according to FEC records and participants.

Among expenses paid for from the Carroll County account were $2,012 to bring former actor and ambassador to Mexico John Gavin from California to Howard County for a fund-raiser at the home of developer Kingdon Gould and $460 for a limousine to transport him. An additional $1,500 was spent on a bus to carry a party of Marylanders to President Bush's inauguration in January.

The Baltimore County committee, a one-woman operation run by longtime Bentley ally Marjorie Neuman of Parkville, used most of its money for a computer to maintain party registration and other records.

The Baltimore committee used $1,452 to buy a printer for the computer and $2,000 to pay off a printing bill for a campaign flier distributed in Prince George's County, said treasurer Linda Bowler Pierson.

David K. Blumberg, the city party chairman, said he informed his members of the cash infusion.

Mrs. Bentley and Mr. Taylor said there were many contributors, some of them prominent Democrats, who wanted to contribute to the Bush campaign but would not give directly through the state GOP either because of antipathy to Mr. Fleming or because they did not want their names on the party contributor list.

Among the best-known contributors, who gave $1,000 each to the Carroll County account, were Henry A. Rosenberg Jr., head of Crown Central Petroleum; Lawrence R. Rachuba, a prominent Towson developer; and W. Dale Hess, a developer and former state delegate who was jailed for political corruption along with former Gov. Marvin Mandel.

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Carroll County Times

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SUNDAY, APRIL 30, 1989 WESTMINSTER, MARYLAND

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SHARON HORNBERGER
Will answer to GOP committee

GOP official to explain transfers of secret accounts

By JORDIE WOODWARD
Staff Writer

The chairperson of the Carroll County Republican Central Committee has been asked to explain how $20,000 in contributions to the Bush campaign — money received from Democrats and from sources outside Carroll — were kept off committee reports.

Contributions were transferred secretly from the Victory '88 campaign — the Maryland effort to elect Vice President Bush — to the committee's federal account with the help of chairperson Sharon Hornberger and committee member Frank Rammes.

The secrecy extended to submitting different account reports to the committee and to the Federal Election Commission. The committee received a report on how much county money was in the account and the FEC received information on the total amount of funds in the account.

Both Hornberger and Rammes said they believed placing the funds in the account and filing different reports was legal.

"I was assured by both chairwoman [Helen] Bentley and the national commiteeman [Richard] Taylor that such use was legal and was a formula that had been practiced in Maryland during the presidential elections in 1980 and 1984, and would again be used throughout the country in the current 1988 cycle," Hornberger's letter states.

Hornberger's letter also states funds were diverted to the local account to keep Dukakis campaign managers from gauging the true strength of the Maryland effort to elect Bush.

Rammes said some contributions were made by "prominent Democrats who did not want to give to the state [GOP] party."

Committee members have asked Hornberger to explain during the committee's regularly scheduled May 6 meeting why she kept the information from the five other members. The committee also has asked her to submit a written statement answering a number of specific questions concerning the origin and disbursement of the money.

Don Taylor, vice chairman of the Carroll committee, said Saturday that Hornberger responded by letter to those questions, but said more clarification is needed.

Although one member has recommended that the committee ask for the resignation of Hornberger and Rammes, Taylor said more information is needed before the committee

Please see GOP, A2

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C.C. Times 4/30/89

GOP

From A1

takes any action.

Both Hornberger and Rammes said Saturday that their actions were legal and they will not resign if asked. "There are no grounds for me to resign, so I will not resign from the central committee," Hornberger said.

Committee member Joseph Getty said Saturday that Hornberger's letter did not answer all the questions asked during the special meeting. He said she was asked to list the source of the receipts that came from outside the county, the nature of the expenditures made outside the county, the people involved in making the decision about placing the funds in the account, the reason why it was done and the reason why it was concealed from most of the members.

Getty said the letter repeats what Hornberge said at the special meeting.

However, Hornberger argued the letter answers the questions.

Hornberger said she made the decision to keep knowledge of the transfers on a "need-to-know" basis. She said she was approached in March of 1988 by Richard Taylor, national committeeman for the state, and finance chairman for Maryland's Victory '88 campaign, about using the county federal account for contributions to the presidential campaign that were made by Democrats.

She said most of the contributions were from people and partnerships that did not want to appear on the state GOP contributors list, since some were likely to be prominent Democrats.

Hornberger said both Taylor and Bentley made the decision that only members of the Victory '88 campaign the Bush campaign and the central committee should be told about the account transfers.

"Need-to-know" was cited as the basis for discussing the details with anyone outside of the camaign," she said.

Rammes was the only committee member actively involved in the campagin, said Hornberger, and he was the only committee member informed. Hornberger also discussed the mater with the treasurer of hte federal account, Gary Bauer.

"Sharon Hornberger made a political decision and I backed her up," said Rammes.

Taylor and other committee members said they are not satisfied that the actions are legal. "It is not one of the things we have been able to determine," he said.

Getty objected to separate books being used. He called the action deceptive and manipulative. On Dec. 1, 1988, the committee was told there was $1,359 in the account, but a Nov. 21 FEC report listed $20,924. The committee was told on Feb. 2 that there was $87 in the account, but on Jan. 31, 1989, the FEC had $13,490 reported.

Getty said the committee was very concerned about not being told about the transfers because all members are liable for violations of FEC regulations.

He also was concerned about the matter lending an appearance of wrongdoing within the committee.

Hornberger disputed that there was an appearance of wrongdoing.

"Our main concern is that Carroll County actually handled campaign funds that have no relevance to Carroll County," he said.

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Carroll County Time

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FRIDAY, MAY 5, 1989 WESTMINSTER, MARYLAND

GOP panel rejects chairman's fund-transfer explanation

By JORDIE WOODWARD
Staff Writer

The Carroll County Republican Central Committee voted Thursday night to reject its chairman's written explanation of why outside contributions to the committee's federal account were kept from five members.

In separate motions, the committee also voted to allow members who still have questions about the way the federal account was handled to submit written questions to the chairman through the secretary. The chairman then must answer all questions in writing.

It also voted to close the federal account as soon as the Federal Elections Commission is satisfied the reporting to the account is complete.

During the meeting committee vice-chairman Don Taylor said checks in the account were originally made to the Victory '88 account and that someone other than the check writer had added the initials of the committee federal fund on the checks. Then federal account treasurer Gary Bauer said he received the checks with the initials on it.

After more than two hours of questioning about how the federal funds were handled and why the transactions were kept secret, committee chairman Sharon Hornberger told members she made a mistake.

"It was not a good decision," she said. "Hindsight 20-20 — obviously it was a bad decision."

Although he didn't elaborate, committee treasurer Lou Wiser, who was not told of the federal transactions, asked Hornberger what her motives were. "What motive clouded that judgment," he said.

Hornberger answered that she did it so that funds that contributors might not give to the state party could be raised to pay for election expenses.

In her written response, Hornberger said the transfers were made so that contribution from prominent Democrats would not appear on the state GOP account listing. She also said that contributions were channeled through the Carroll and two other central committees to disguise the strength of the Bush campaign in Maryland from the Michael Dukakis campaign.

However, several committee mem-

Please see GOP, A3

State says no laws were broken

By JORDIE WOODWARD
Staff Writer

Although members of the Carroll County Republican Central Committee have questioned the legality of the chairman allowing secret transfers of outside funds into the federal account, the office of the state prosecutor is not conducting an investigation.

Bernard Penner, assistant state prosecutor, confirmed Thursday that committee member Joseph Getty had contacted the prosecutor's office about possible illegalities in the reporting of the funds to the committee. However, he said the information Getty gave him did not warrant an investigation. "We are not taking any action," he said.

Sharon Hornberger, central committee chairman, allowed the secret transfers of outside presidential campaign funds to the federal account. The account transactions were kept from the five members of the committee who were not actively involved in the Bush campaign.

Separate books were kept, said

Please see Legality, A3

Legality

From A1

Getty — an accurate account was submitted to the FEC and another report was compiled for the committee, showing only transactions of county-raised funds.

As long as the account transactions were reported accurately to the Federal Election Commission, however, there is no violation of public disclosure laws, Penner said.

Although the attorney general's office couldn't offer an opinion on the matter, an attorney there said no laws appear to have been broken.

Elona Shelley-Rawlings said at most, it appeared to be a violation of the spirit of the committee's internal rules. Although the charter and bylaws of central committees must be registered with the state, the state has no enforcement powers of those bylaws.

GOP

From A1

bers questioned the validity of her reasoning, pointing out that the bulk of the contributions were deposited in the account shortly before and after the presidential elections.

Getty also questioned whether most of the contributors were prominent Democrats and pointed out that some were Republicans.

Hornberger said she could not determine the party of the contributors since she did not collect the funds. She said the solicitation was handled by Rep. Helen Bentley, campaign chairperson for both the Victory '88 and Bush campaigns, and Richard Taylor, national committeeman and finance chairman for Victory '88.

She also said Bentley and Taylor handled decisions about which central committee the checks were deposited and how the funds would be spent.

"We did not raise funds," she said. "We acccepted the funds and served as a conduit."

Getty asked how the $20,000 in the account could possibly confuse the Dukakis campaign when the state raised more than $400,000 for the Bush campaign.

Hornberger said that Carroll wasn't the only central committee receiving funds, Baltimore County and city committees were also involved.

Wiser asked why the Baltimore central committee chairman told its members about the funds transfers if, as Hornberger has said, Bentley advised knowledge of the transfers should only be on a need-to-know basis.

Hornberger replied she did not know what that chairman was told.

When asked why the bulk of the funds were deposited shortly before and after the election, Hornberger explained those dates were when the funds came in. She said the commitment for the funds was made earlier and that the contributors were late in sending the checks.

She said the funds were needed for election expenses which had carried over after the election.

According to Getty, the funds were used for travel expenses for Ambassador John Gavin, limousine service for Bentley and Gavin, postage and computer rentals.

He questioned whether they were expenses really related to the campaign.

Hornberger said the money was important to the overall campaign effort and that excess money was necessary for party building.

She said about $11,000 of the money, which was transferred to the Baltimore County Victory '88 Fund and the Freestate Victory '88 Fund in February and March, was used to buy a computer for the Victory '88 campaign.

Carroll County Times

SATURDAY, MAY 6, 1989

WESTMINSTER, MARYLAND

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Secret GOP money used for Bush lists

By JORDIE WOODWARD
Staff Writer

A portion of the $20,000 secretly placed in the Carroll County Republican Central Committee federal account was used to develop lists of Bush campaign volunteers and contributors, and to buy a computer to maintain the information.

During a meeting of the committee Thursday night, chairwoman Sharon Hornberger told members that $10,000 was transferred to the the Baltimore County Victory '88 Fund. Another $5,000 sent to the Baltimore city Freestate Fund in February was used to buy a computer system and printer.

According to Federal Elections Commission records, $3,832 also was disbursed after the election to pay for computer services: $2,632 was paid to Leslie Jacoby, a volunteer who lives in Parkville, for her time in developing the database during the campaign and supplies for her personal computer which was used at campaign headquarters.

Marge Newman, a member of the Baltimore County Republican Central Committee, received $1,200 for computer rental; however, she said Friday the money was paid for her services in developing the lists.

Hornberger allowed more than $20,000 in outside presidential campaign funds to be placed in the committee's federal account without the knowledge of five of the seven members on the committee. The funds were controlled by Rep. Helen D. Bentley, chairwoman of the Victory '88 and Bush campaigns, and state committeeman Richard Taylor, finance chairman of Victory '88.

Jacoby said she is keeping the new computer system at her home temporarily because it is convenient for her schedule.

Taylor said Friday that Bentley authorized the purchase of the computer. Bentley, the 2nd District Republican Congresswoman representing parts of Baltimore and Harford counties, was out of town Friday and could not be reached for comment.

According to both Newman and Jacoby, the information was developed and is being maintained sepa-

Please see GOP, A3

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GOP

From A1

rately from the state Republican Central Committee.

Newman said the information is under the control of a "loosely-knit" group which controlled the Bush campaign. Bentley was the chairwoman of the campaign.

Newman said the grassroots group does not meet or hold elections. "There's nothing on paper," she said. "It's just there."

She said she realized the structure of the group was unusual.

Although there are differences between Bentley-led forces and a faction headed by state committee chairman Dan Fleming, Newman said access to the information is available to any serious Republican candidate or organization.

If a candidate from the Fleming side were to ask for help, she said there will be no problem. "I see no problem helping any candidate."

Hornberger said she was unaware of the location of the computer in Baltimore County. However, she said the computer would be under the control of the national committee people — Bentley and Taylor. "They raised the funds," she said.

She said that the funds used to buy the computer were from the Victory '88 organization, which is part of the Maryland Republican Party and thus the state central committee.

She said the computer was purchased so the information collected during the campaign can be maintained and updated, providing a web of contacts for the next federal election.

She said campaign workers had to start over during the last election because none of the information was stored.

The information also will be available for state and local campaigns, she said. Hornberger said she was told it will be available to all Republicans.

Jacoby said the Zenith 386 computer has an 80 megabyte hard drive needed to maintain statewide lists. The system also has a commercial-size printer. It includes two disk drives to provide compatibility with volunteers who work on personal computers.



REP. HELEN D. BENTLEY
Victory '88 chairwoman

She said the information is stored so that various lists can be created, down to the type of volunteer work the person is willing to handle to whether the person is a contributor.

She said she works mostly with county central committee chairmen and Maryland Federated Republican Women.

She said that none of the state central committee officers have shown any interest in the computer work. "I would work with Annapolis if they would work with me, but they don't seem the least bit interested," she said.

Hornberger said that could be because of the lack of political activity now, since state elections don't come up until 1990.

2004081217

Balt. Morning Sun 5/6/89

Carroll GOP chairwoman discredited

By Sheridan Lyons
Carroll County Bureau of The Sun

WESTMINSTER — The Carroll County Republican Central Committee voted 5-1 Thursday to reject its chairwoman's explanation of the secret use of the committee's federal account to stash about $20,000 raised for the 1988 presidential campaign.

Committee members Joseph M. Getty, vice chairman Donald Taylor and treasurer Louis Wiser said they didn't believe the reasons Sharon Hornberger gave for allowing the use of the account for the campaign funds, and they criticized her for putting them at risk of being liable for any financial irregularities resulting from an action they knew nothing about.

The group, after grilling Ms. Hornberger for about two hours, voted to reject her letter of explanation and to ask her additional detailed questions in writing.

In the April 27 letter, Ms. Hornberger said she was asked last year by Representative Helen Delich Bentley, R-Md.-2nd, and Richard P. Taylor, GOP national committeeman and President Bush's finance chairman for Maryland, to allow use of the committee's account to hide the campaign's strength from Democratic presidential candidate Michael

The GOP Central Committee didn't believe the reasons Sharon Hornberger gave for allowing the use of its federal account for campaign funds.

S. Dukakis and to protect prominent Democrats who wanted to contribute to the Bush campaign but not to the state Republican Party.

An article in *The Sun* last week disclosed that Mrs. Bentley secretly had transferred the money into the committee's account, in part to keep it away from her party rival, state GOP Chairman Daniel E. Fleming. The transfer was legal but has led to a call for Ms. Hornberger's resignation and for that of Frank Rammes, county chairman of President Bush's Victory '88 campaign.

Ms. Hornberger said last night that, although Mrs. Bentley had asked her to disclose the use of the account only on a "need to know" basis, she showed "poor judgment" in agreeing to conceal its use from the rest of the committee.

"What motive clouded that judgment?" Mr. Wiser asked. "This is such an important matter: You bring everything else to the committee; you don't make major decisions involving the committee and its responsibilities on your own.

"I can't accept this report as the actual reason for why it was handled the way it was," he said.

Mr. Wiser and Mr. Getty cited specific deposits and withdrawals that concerned them, but Ms. Hornberger insisted there was no improper use of the money in the account.

"A lot of money appears to have been received to get George Bush elected after the fact," Mr. Wiser said. "My point is, all these dates, your letter doesn't hold water with all these dates. It leaves me with that taste that you are trying to cover something — what?" he asked.

"You are wrong," Ms. Hornberger responded.

"I knew you'd say that," Mr. Wiser said, smiling.

Committee members learned that the account had been used for presidential campaign funds last month when they attempted to close it, believing it contained only $87, and discovered that it had held more than $20,000. Although the committee had not been told of the transfers, the full amount in the amount had been reported to the federal elections commission.

"Won't you admit that it looks suspicious?" Mr. Getty said of the transfers. "And that we are responsible as members of the committee?" Mr. Wiser added.

Afterward, Ms. Hornberger said the meeting had gone about as she had expected and that she had not worried about being ousted because the bylaws don't permit such action by the committee.

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The Evening Sun
Baltimore, Monday, May 8, 1989
A10

Party-busting

"It was my desire to do all in my power within the law to help elect George Bush and assist the Republican party." So says Sharon Hornberger, chair of the Carroll County Republican Central Committee. Loyalty has become an excuse for covert operations of all types. And the lesson has not been lost on Maryland.

It is no secret that for the past two years, the state GOP has been torn apart by a rift between the party's right wing (symbolized by state party chairman Daniel Fleming) and its more moderate faction (led by Rep. Helen Bentley, from the state's second district.) But the power grab got out of hand. Last summer, Bentley, Richard Taylor, Bush's state campaign chairman, and Susan Saum-Wicklein, the state GOP treasurer, opened a GOP account for candidate Bush in Hagerstown, which they controlled. When Fleming found out, he was livid, and the triumvirate agreed to close the account and transfer all money to the party's Victory 88 account in Annapolis. But they didn't.

Bentley and three local Republicans turned right around and secretly stashed $20,000 in presidential campaign funds in the Carroll County Central Committee's federal account. Bentley says one reason was that she wanted to make it difficult for Governor Dukakis' supporters to find out how much money the Maryland GOP had for Bush. Uhhhh huh.

The more believable reason, which Bentley admits, is that a flurry of contributions came during the rift in the party over Fleming's release of controversial campaign literature concerning the release of Willie Horton, a black murderer who raped a white Maryland woman while on furlough from a Massachusetts prison.

Bentley exacted pledges of secrecy from Hornberger (whom she then recommended for a federal job) and Frank Rammes, county chairman of the Bush's Victory '88 campaign, who misled their other five colleagues about the money in the account. Gary Bauer, treasurer of the federal account, produced phony reports to perpetuate the fraud on the rest of the committee.

The transfer of funds was perfectly legal, and the money was indeed used for justifiable campaign expenses. But that hardly mitigates the sleaze factor. Or the deception. The irony, of course, is that Bentley's effort to build the party ended in party-busting in a county where the GOP was strong; at a Central Committee meeting Thursday, angry members voted 5-1 to reject an explanation Hornberger had concocted. In the name of the public trust, Hornberger and Taylor should immediately resign. And Bentley should learn to play politics in the light of public scrutiny.

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Sports / Oakland blasts the struggling Orioles 6-1 / B1

Carroll County Times

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TUESDAY, MAY 9, 1989 WESTMINSTER, MARYLAND 35 CENTS

A.M. DIGEST

Weather



Cloudy with rain developing by late this morning. Highs 55 to 60. Chance of rain 90 percent. Tonight: rain. Lows 45 to 50. Chance of rain 90 percent. Wednesday: rain likely changing to showers by early afternoon. Complete weather, A2.

Nation

Bentley: Favoritism accusations 'nonsense'

By CARMEN AMEDORI
Staff Writer

An accusation that Sharon Hornberger was playing the game of political favoritism when she agreed to conceal the transfer of GOP money is "nonsense," says Congresswomen Helen D. Bentley.

The allegation was presented by Joe Getty, a member of the Carroll County Republican Central Committee, after members were told Hornberger allowed $20,000 to be secretly transferred into a Carroll County GOP account from the Victory '88 campaign.



BENTLEY

Other members of the Carroll committee would have known about the money had they been actively involved in the election, Bentley said.

"None of them did anything to help with the election," Bentley said. "One of the responsibilities as a committee member is that they help with the election, but they were for other people. When (President George) Bush got nominated, they all were very unhappy."

Hornberger said she confronted Bentley and Richard Taylor, finance chairman of Victory '88, in March telling them "no way can this be kept from all the members of the committee." Bentley told Hornberger the committee members could be told eventually.

> *'None of them (Carroll GOP committee members other than Hornberger) did anything to help with the election.'*
>
> — Helen Bentley.

"I never imagined all these people would be so angry with me," Hornberger said.

Getty has suggested Hornberger's actions were due to her aspiration to climb the rungs of the political ladder.

Getty contends that if Sen. Raymond Beck, R-Carroll/Baltimore, should be appointed as Carroll's third judge this summer, his replacement as senator would be based on recommendations by members of the CCRCC and/or the Baltimore County Republican Committee.

He also suggested the ties Bentley has with the Baltimore County committee and because she is "recognized statewide as the most loyal Republican supporter and friend of Gov. William Donald Schaefer" would have an influence on the governor's decision for replacement.

"I hope Sharon does have aspirations," Bentley said. "There are a lot of people who don't understand

Please see Bentley, A3

Fleming says computer bought with transferred funds is state's

By JORDIE WOODWARD
Staff Writer

There's room in Annapolis for a computer system secretly bought with Victory '88 funds, Daniel Fleming, chairman of the Maryland Republican Central Committee said Monday.

Fleming said the computer, which was purchased with funds initially diverted into the Carroll County Republican Central Committee federal account in October and November, belongs to the state party. He said the matter will likely be settled Friday night during a pre-convention meeting of the state Executive committee in Ocean City.

"We'll have to make room for it at headquarters," he said.

Rep. Helen Bentley, who represents parts of Baltimore and Harford counties, said the question will be decided at the meeting, but refused to comment further.

The computer, now at the home of a campaign volunteer, was purchased for about about $10,000 with funds transferred secretly into the Carroll County account and then into Baltimore county and city federal accounts in February. The fund transfers and computer purchase were authorized by Bentley.

During a telephone interview, Fleming said he was not told of the computer or of the information on file of Bush campaign volunteers and contributors.

But it will make a nice addition for the state system, he said.

Sharon Hornberger, chairper-

Please see Computer, A3

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Bentley

From A1

politics. She has a good grasp on the whole political picture."

Hornberger, chairperson of Carroll's GOP since December 1988, has denied the allegation. Hornberger has been a member of the GOP central committee since 1986 when first elected. Last spring, as vice-chair she slid into the chairman vacancy created by the resignation of Jerry F. Barnes.

Hornberger consented to transferring the money controlled by Bentley and Taylor without the knowledge or approval from the other five Carroll committee members.

State officials said the transfer was not illegal but was a blow to the internal integrity of the Carroll committee.

"There is the question of whether certain money needs to be divulged," Bentley said. "It was listed on the FEC (the Federal Election Commission) report. That was legal."

However, Dan Fleming, chairman of the State Central Committee, said the county account is not under the state's control, which could mean the transfer is illegal. The matter is to be discussed at a state meeting this Friday at the Republican Convention at the Sheraton Hotel in Ocean City, he said.

Bentley supported the explanation Hornberger gave other committee members at a May 4 meeting.

She explained the money was kept secret to disguise the strength of the George Bush campaign. She also stated they didn't want Fleming to have control of the money for fear that contributions would not be made.

During the campaign, Fleming had approved anti-Michael S. Dukakis literature — a "Get Out Of Jail [illegible]

committee can be made during a convention.

However, Fleming and Getty said that may not be possible because the law may be outdated.

"Malfeasance could be hard to prove," Fleming said. "And I would be hesitant to do that at a convention. They can request her resignation from office, but she would still be a member."

Hornberger has said she will not resign.

"I will have to work hard to prove I am the person they thought I was when I was elected," she said. "I worked hard, honest and diligently to turn Carroll County around."

She said she was not going to let this ordeal wear her down.

"I have much more strength than that," Hornberger said. "If I didn't, then I haven't learned anything in the time I've been involved with the committee."

While Bentley said "I have great respect for people who work in the vineyards and Sharon is one of them," Fleming said perhaps the grapes may have been soured by Hornberger's ambitions.

"Sharon may have a good grasp of the picture but she doesn't have any on political judgment," he said. "When you keep something like that from the members of your own committee, you can't expect to come away unscathed. The central committee is responsible for that account. You can not give misleading reports and get out clean. My God, this is the party."

Hornberger, an administrative assistant to Beck, said she submitted a resume to Bentley for a possible position on the presidential transition team.

"I, along with 100 or 150 other coordinators and co-chairpeople involved with the Victory '88 campaign," Hornberger said. "We were [illegible]

Computer

From A1

son of the Carroll County Republican Central Committee, allowed more than $20,000 in outside presidential campaign funds to be placed in the committee's federal account without telling five of the seven committee members. The funds were controlled by Bentley, who was chairwoman of the Victory '88 and Bush campaigns and Richard Taylor, finance chairman of the Victory '88 campaign.

Bentley said the computer is owned by the Baltimore County Victory '88 organization because it was bought with funds in that account.

Fleming disputes that claim. He says the Victory '88 campaign is a fund set up by the state central committee, so funds raised in the campaign belong to the committee. "What happened is the money never got into the state Victory '88 account," he said.

The initial computer work was done by a volunteer Leslie Jacoby on her personal computer, said Bentley, but eventually became too much for the system to handle. "We wore her computer out," she said.

Jacoby is continuing her work compiling lists of Victory '88 volunteers and contributors, Bentley said. The Victory '88 campaign comprised all federal elections.

"She does have it and she can use it if she wants to," she said.

Bentley skirted around the issue of whether the lists would go to the state central committee, stating only that all the county central committees would get them.

But the lists are something Fleming claims are the property of the state central committee. He said his organizations need the lists and that he had asked national committeeman Richard Taylor to give him volunteer information.

He said he found out the information was being solicited from people involved in the campaign earlier this year after a letter was sent out by Bentley and Ray Briscuso, executive director of the state Bush campaign. The letter thanked supporters and requested information about future contributions or volunteer work.

Fleming said he was not told about the letter, but found out about it and asked Taylor for the responses.

Taylor said Monday he could only get the information from Bentley and had not done so yet.

Although the state office already has a computer system, Fleming said it doesn't have the capability of the one purchased with the secret funds.

The state system keeps track of past and present donor lists and financial records. It does not keep track of volunteers.

Although Bentley has said the money was deposited in local central committee accounts to keep it from Fleming's control, Fleming said he never had direct control of the two-signature account.

He said all disbursements had to be approved and countersigned by Michael Burns, executive director of the committee, and Taylor. He said that method was agreed to last summer.

Fleming said the matter should be settled during the committee meeting, rather than during the state Republican party convention. "I'd rather not settle it on the floor," he said. Fleming said some people think the action is a move to start an alternative Republican party in the state. Although a part of him thinks it may be such an effort, he doesn't give much credence to the thought.

"The Republican Party transcends these differences between party officials," he said.

Horne appointed

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She explained the money was kept secret to disguise the strength of the George Bush campaign. She stated they didn't want Fleming have control of the money for that contributions would not be made.

During the campaign, Fleming had approved anti-Michael S. Dukakis literature — a "Get Out Of Jail Free" card — which was questioned because it did not identify who authorized it.

However, Fleming said, he does not have control of the account, which requires two signatures. Taylor and Michael Burns, executive director of the State Central Committee, must sign checks on that account.

"Besides, I would have to be crazy not to authorize something, just to spite Helen Bentley," Fleming said.

Getty has called for for Hornberger's resignation and said he would look into having her drummed out of the state committee.

According to the county by-laws the committee has sole discretion dge malfeasance, misfeasance on-feasance. If a member is guilty, a request to have that person expelled from the state

this ordeal will fall down.

"I have much more strength than that," Hornberger said. "If I didn't, then I haven't learned anything in the time I've been involved with the committee."

While Bentley said "I have great respect for people who work in the vineyards and Sharon is one of them," Fleming said perhaps the grapes may have been soured by Hornberger's ambitions.

"Sharon may have a good grasp of the picture but she doesn't have any on political judgment," he said. "When you keep something like that from the members of your own committee, you can't expect to come away unscathed. The central committee is responsible for that account. You can not give misleading reports and get out clean. My God, this is the party."

Hornberger, an administrative assistant to Beck, said she submitted a resume to Bentley for a possible position on the presidential transition team.

"I, along with 100 or 150 other coordinators and co-chairpeople involved with the Victory '88 campaign," Hornberger said. "We were asked to submit a resume with the hope that some of us might be selected."

Noting she allowed the "decades of experience and expertise" of Bentley and Taylor to distort her thinking, Hornberger said, "Sharon got caught making a bad judgment call.

"By agreeing to work with these national committee people, I took out of the loop my normal advisers. They told me, 'We need you to do this,' and to only let those who need to know, know. They said they would let me know when others could be told.

"There are just too many 'what ifs' and 'ands' ", Hornberger said of Getty's accusations. "It just wouldn't be politically astute for me to run against an incumbent."

says the Victory '88 campaign is a fund set up by the state central committee, so funds raised in the campaign belong to the committee. "What happened is the money never got into the state Victory '88 account," he said.

The initial computer work was done by a volunteer Leslie Jacoby on her personal computer, said Bentley, but eventually became too much for the system to handle. "We wore her computer out," she said.

Jacoby is continuing her work compiling lists of Victory '88 volunteers and contributors, Bentley said. The Victory '88 campaign comprised all federal elections.

"She does have it and she can use it if she wants to," she said.

Bentley skirted around the issue

Horne appointed to bench

Associated Press

ANNAPOLIS — William S. Horne, chairman of the House Judiciary Committee, was appointed as a judge of the circuit court Monday by Gov. William Donald Schaefer.

House Speaker R. Clayton Mitchell Jr. immediately announced that Delegate Daniel M. Long, another Eastern Shore lawmaker, would replace Horne as chairman of the Judiciary Committee.

Horne was appointed to the circuit court for Talbot County to replace John C. North II, who was sworn in last week as chairman of the state Critical Areas Commission.

The governor also announced Monday the appointment of James B. Dudley to the Howard County Circuit Court replacing Robert Fischer, who was elevated to the Court of Special Appeals last Sep-

about future contributions or volunteer work.

that committee accounts to keep it from Fleming's control. Fleming said he never had direct control of the

these differences between party officials," he said.

Rain

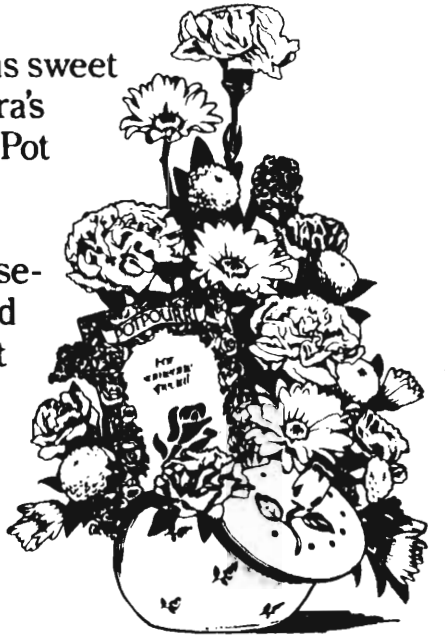
From A1

unpredictable

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ELDERSBURG HAMPSTEAD

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Baltimore Sunday Sun 5/14/89

State GOP avoids fight over funds

Fleming camp stays quiet over diversion

By John W. Frece
Sun Staff Correspondent

OCEAN CITY — Maryland's ideologically divided Republicans restrained themselves yesterday, concluding their two-day spring convention without the damaging floor fight over secret diversions of campaign funds many feared could further splinter the state party.

"I think we held it all under control," said Representative Helen Delich Bentley, R-2nd, Maryland's GOP national committeewoman, who has personally been at the center of the latest fight between the party's new-right, fundamentalist Christian faction and the more traditional conservative and moderate wing that she represents.

Friday night, the ruling executive committee engaged in a contentious dispute over whether Mrs. Bentley and GOP National Committeeman Richard P. Taylor had acted improperly by secretly diverting at least $89,000 in campaign donations intended for the 1988 Republican presidential campaign to federal accounts in Carroll County and Baltimore specifically to help George Bush.

Although the diversion was apparently legal, it has set off an uproar within the party because Mrs. Bentley admitted that one reason for the shift was to keep the funds out of the hands of her rival, state party Chairman Daniel E. Fleming.

Against Mr. Fleming's wishes, the executive committee voted Friday night to have Mrs. Bentley and Mr. Taylor assist Mr. Fleming in investigating the shift of funds they had jointly engineered.

See GOP, 6B, Col. 3

GOP quiet over funds

GOP, from 1B

Outraged Fleming allies were expected to ignite the controversy again yesterday by asking the 173 delegates to the state convention to reverse the executive committee's action.

But the controversial issue never came up, apparently partly out of fear that that would prompt Fleming opponents to revive a move for his ouster.

"There was a tremendous undercurrent in here," Mr. Fleming said after the tense meeting. "Both sides were poised like rattlesnakes."

But rather than air the party's dirty laundry in public again, the two factions seemed content to demonstrate their muscle on less contentious matters.

The only roll-call vote of the day, for instance, came in a dispute over whether the word "immediately" should be included in a state party resolution calling on President Bush to pardon Oliver L. North. The word "immediately" was dropped.

By voice vote, the Republicans also adopted an anti-union resolution calling for a "right-to-work" law in Maryland — a stance Republicans from unionized areas of the state said they feared could backfire.

The convention then tabled a resolution urging the Supreme Court to overturn or significantly restrict its Roe vs. Wade abortion decision. Even some anti-abortion delegates saw the potential divisiveness of the resolution and urged its defeat.

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WEDNESDAY, MAY 24, 1989

The Washington Post

WEATHER/OBITUA... B1

METRO

'Secret' Campaign Funds Divide Md. GOP—Again

By Robert Barnes
Washington Post Staff Writer

ANNAPOLIS—When Federal Trade Commission Chairman Daniel Oliver decided last fall to contribute to George Bush's presidential campaign, he called the Republican National Committee for advice. He was told to send a check to a fund-raising arm of the party called Victory 88.

Oliver complied, but he recently discovered that the payee line of his $1,000 check had been altered, that it wasn't cashed until days before the November election and that it somehow wound up in Carroll County, Md.

In a letter to a Maryland Republican official, Oliver posed these questions: "What I want to know is, what happened? And who did it? And why? .... [Who] tampered with my check? How was the money used? And why wasn't the check deposited until sometime in November? How many other checks were handled in this way?"

The recent discovery of what some Maryland Republican Party officials are calling secret campaign funds established during the presidential campaign has once again split the party, which has been more contentious than celebratory in the six months since Bush's surprise victory in the state.

In the latest spat, Party Chairman Daniel E. Fleming has called for a full investigation of the way his party rival, Rep. Helen D. Bentley, the party's senior elected official, and Republican National Committeeman Richard Taylor controlled two local funds that received about $100,000 during last fall's campaign. "The issue is too sensitive for anyone to say, 'You ought to keep quiet about this,' " said Fleming. "I won't cover things up."

See MARYLAND, B6, Col. 1

'Secret' Campaign Funds Widen Rift in Md. GOP

MARYLAND, From B1

Others in the party, however, believe the feud between Fleming, who heads the most conservative faction of the party, and Bentley, who is more moderate, is central to Fleming's decision to push for an investigation.

However, when Fleming, who was pointedly kept in the dark about the funds, asked the state executive committee to set up a panel to look into the matter, the members voted to include Bentley and Taylor.

"That's like putting John Poindexter and Robert McFarlane on the committee investigating Contragate," said Fleming.

Besides widening the rift in the state GOP ranks, the public attention the issue is receiving will likely arm those who have criticized the way national parties and presidential campaigns use local political organizations to override federal limits on presidential campaign spending.

For instance, the Bush campaign was no longer collecting contributions last fall when Oliver made his inquiry because of the limits that come with the public financing of presidential elections.

Both Democrats and Republicans instead expanded the use of so-called "soft money," contributions that often go to state and local parties that in turn spend money on behalf of the candidates.

Common Cause has sued the Federal Elections Commission to force more restrictions on such money.

The attention is also unwelcome at the Republican National Committee, which directly contributed $15,000 to one of the funds and which Fleming believes served as a funnel for contributions sent to national headquarters.

"We don't want to get caught up in that little struggle," said RNC Chief of Staff Mary Matalin, referring to the feud within the Maryland party.

Matalin headed the Victory 88 campaign and said the RNC had no role in diverting contributions to the funds controlled by Bentley.

Oliver was out of the country and could not be reached for comment, but his letter to a Maryland official indicates otherwise.

He wrote that he made out the check to "Victory 88" and sent it to RNC headquarters in Washington, but someone added the initials "CCRCCFA."

It thus ended up in the Carroll County Republican Central Committee's federal account, along with other checks, including one from former labor secretary Ann Dore McLaughlin, written to Victory 88.

Unknown to most members of the county central committee, county party Chairwoman Sharon Hornberger had agreed to Bentley's request to use the account to aid the Bush campaign.

The story became public when members of the county central committee discovered the practice and told reporters from local newspapers.

The existence of the account, plus a similar fund in Baltimore, was kept from Fleming and other officials of the Maryland Victory 88 committee.

The Carroll County fund eventually raised $37,000, while the Baltimore fund raised nearly $70,000, including $15,000 from the Republican National Committee.

In an ironic twist, $17,000 of the money in the Baltimore account was spent to pay some of the city's traditionally strong Democratic clubs to pass out campaign literature on Election Day.

At least part of the literature was "Democrats for Bush" cards, but not for the GOP candidates for Congress. The cards instead endorsed liberal Democratic Sen. Paul S. Sarbanes and Rep. Benjamin L. Cardin (D-Md.).

Taylor and others in the party assert there was nothing illegal or even unorthodox about the way the campaign money was handled.

They pointed out that it was reported to the FEC and they said the money was diverted to local accounts to hide it from Democrats and to protect Democratic contributors who didn't want to be identified as giving money to the state party.

Bentley, who did not return telephone calls, has also told party members she wanted to keep the money away from Fleming, whose resignation she had sought after Fleming mailed a controversial letter that linked convicted murderer Willie Horton Jr. and Democratic presidential candidate Michael S. Dukakis as a "profamily team."

FEC officials were reluctant to discuss whether any of the transactions violated federal law. The RNC's Matalin, who directed the Victory 88 program, was adamant that they hadn't.

"I just don't see anything that's illegal and just because he [Fleming] didn't know about it is not atypical," she said. There were similar funds in other states, Matalin added.

Fleming and state party officials are scheduled to meet with RNC officials today.

Maryland State Prosecutor Stephen Montanarelli has declined a request from a Carroll County Central Committee member to investigate the transactions.

Committee member Joseph Getty said his committee is waiting for further explanations from Hornberger before deciding whether to file an official complaint with the FEC.

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. the only solution in that area was to use a metal clamp," said Curran. "We [illegible] weld it there because its [illegible]c liner."

County workers avoided digging through trash to get to the leak because the lowest acre of the 15-acre "cell" was kept clear of debris since the landfill opened in November. Water flowing there from the rest of the landfill had collected in a small pond directly above the leak, hole two feet down and three feet square to get to the liner, Curran said.

"We found that the clamp was loose," he said. "That was getting 20 feet of water pressure (on the surface) — enough to push it if it was close (to leaking.)"

The company refitted the clamp and wrapped it with a new piece of

Please see Landfill, A4



SHARON HORNBERGER
Probe in hands of state party

Carroll GOP officer filing a complaint

By JORDIE WOODWARD
Staff Writer

The treasurer of the Carroll County Republican Committee said Thursday he intends to mail a formal complaint to the Federal Election Commission concerning funds that were secretly deposited in the committee's federal account last year.

Louis Wiser, committee treasurer, took over the federal account this April from Gary Bauer after the committee discovered committee chairwoman Sharon Hornberger allowed outside funds to be placed in the federal account without the majority of the members' knowledge.

Wiser said he discovered several problems with the way the funds were handled and wants the FEC to investigate the matter. He said he has contacted FEC officials about the problems and was advised to submit a written complaint.

He intends to send the letter with supporting documentation soon, possibly this week.

Although he declined to go into detail about the possible election law violations, he said the altered checks are included in the complaint.

The checks where made out to Victory '88 and were altered with the initials CCRCCFA, the Carroll County Republican Central Committee Federal Account.

Bauer, who was treasurer when the checks were deposited, has said the initials were on the check when he received them.

Although Wiser could not go into any detail about the number of checks altered, at least one check writer has complained about the way his funds were used.

Daniel Oliver, chairman of the Federal Trade Commission, complained in a letter to a Maryland official that the payee line of his $1,000 check had been altered and that it wasn't cashed until days before the November election. "There's no question about altered checks," Wiser said.

The Republican Central Committee voted earlier this month to reject Hornberger's explanation of

Please see GOP, A4



Ken Koons photo

Moms on the Move meeting at the Freedom Community Center.

eads the cost and work

The co-op is a "social group (that) provides a time of fun, friendship, and knowledge. . .(of women who are) bound together by our interest in our children," Nemeth said.

Programs have already included presentations by a dentist and a doctor, trips to McDonald's, Piney Run Nature Center and a beekeeper.

The summer program schedule begins June 7 with a picnic at the Westminster playground, and includes outings to the Baltimore Zoo (June 22), Greenbrier State Park (July 26) for an "unbirthday party," and the National Aquarium (Aug. 30).

Programs for Moms Only include a luncheon and a New Market shopping and antiquing excursion.

Moms on the Move encourages flexible participation. "You can be as involved as you want to be," said Kreeger and Nemeth.

"You don't have to join a playgroup or babysitting co-op if you don't want to, or can't. But they're there if you do," Kreeger said. "You can just come to our meetings, and go on the outings, or. . .use the phone list to find someone to go someplace with you when you don't want to go alone (with your toddler)."

"It's just what I was looking for," said Chris Cohn of Sykesville. "I stayed home (from working) just

Please see Moms, A8

ay at taxes

A parade, fireworks and

GOP

From A1

why outside contributions were kept from five members.

The committee voted to submit written questions to her and asked to require her to answer those questions in writing.

Hornberger responded to the questions in a brief letter dated May 20.

In the letter, Hornberger said the investigation is now in the hands of the state party. The Maryland State Republican Party Executive Committee met in Ocean City on May 12 and discussed the matter. It referred the matter to a committee appointed by state party chairman Daniel Fleming, she wrote.

"It was specifically stated by Mr. Fleming as chairman that the only issue left to the local central committees involved, should they wish to pursue it, is what disclosure was made to individual member of the respective central committees," she wrote in her response.

Hornberger said she already has answered all questions about disclosure to committee members, both orally and in a written response dated April 27.

In that letter, Hornberger said she was urged by Rep. Helen Bentley, R-Md., not to discuss the matter with anyone who was not involved with either of the Bush or Victory '88 campaigns except on a "need-to-know" basis.

Wiser said he called a special meeting for May 25 to discuss Hornberger's latest response. However, that meeting was canceled Thursday.

Meanwhile, committee members are being tight-lipped about Hornberger's response to their questions — a sharp contrast to their former openness on the matter.

Members discussed the matter with the press before its May 4 meeting and opened that meeting to the press.

When asked for a copy of the questions submitted to Hornberger, members said it was up to Hornberger to release it. Hornberger refused to release the questions because she is sending them to the investigating committee set up by the state executive committee.

Sitting on that panel are Bentley and Richard Taylor, both of whom were involved with the transfer of the outside campaign funds. Taylor contacted Hornberger to set up the account initially and Bentley controlled the transfer and use of the funds.

However, Wiser said the questions submitted to Hornberger included many of the questions raised during the meeting, but in more detail.

During that meeting, members asked Hornberger to answer how the money was used and why the bulk of it was deposited in the account in November, just before and after the general election. Members also questioned Hornberger about how the funds were spent and whether those expenses were related to the campaign.

"The meeting raised many more questions because of the answers and lack of answers," Wiser said.



Ecology-minded

The 200 county middle school students that e science exhibit in March were treated to ecol Hashawha. Students tested water and air, watcl and listened to speakers. Lauren Witt, 12, a W sixth-grader portrayed a bottle headed for a la produced play.

Landfill

From A1

liner, Curran said. The company used additional clamps on the section before coating it with a layer of epoxy, he added.

Keith Kirschnick, assistant public works director, said county officials now view that area as too "sensitive" to fill with trash.

"Instead of filling the above area with solid waste, we're going to fill it with fill dirt," he said.

"That way, if something happens in the future, we'll be able to get to it," he said. "I hope it's resolved now.

County officials will test the seal later this week, he added.

Curran said one result of the leak is that county officials have ruled out using a similar clamping system when they begin expanding a second cell by the end of the year.

But the county remains confident in the double-lined system, despite the leak, he added.

"Don't forget, the Maryland Department of the Environment is telling counties that this is the only system they'll approve," he said.

"The fact that there was a secondary system to catch it (the leak) shows that the system works," he added.

Holiday

From A1

dents and $4 per car for nonresidents.

Shoppers will be able to take advantage of Memorial Day sales all weekend long. Although many Main Street retailers will be closed Memorial day, Cranberry Mall will be open 10-5.

J.C. Penney in Westminster will be open Memorial Day as well as many of the stores in 140 Village Shopping Center and Carrolltowne Mall.

For those who decide to travel this weekend, the state police expect the heav and Monday, and return fro

Those heade see heavy traf and higher pri

Gas prices h since Easter, gallon nationa per gallon dur per gallon p average price 1985.

Other even clude Hamps from 8 a.m.t

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1989

Louis E. Wiser, Jr., Treasurer
Carroll County Republican Central
Committee of Federal Account
2810 Gillis Street
Mt. Airy, Md. 21771

RE: Pre-MUR 217

Dear Mr. Wiser:

This is to acknowledge receipt of your letter received May 30, 1989, pertaining to the Carroll County Republican Central Committee of Federal Account. You will be notified as soon as the Federal Election Commission takes action on your submission.

If you have any questions, please call George Rishel, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling matters such as this.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

Pre-MUR 217
STAFF MEMBERS: George F. Rishel
Jeffrey Long

SOURCE OF MUR: S U A S P O N T E

RESPONDENTS: Carroll County Republican Central Committee

Gary W. Bauer, former treasurer

Representative Helen Delich Bentley

Richard P. Taylor

Republican National Committee

RELEVANT STATUTES:
2 U.S.C. § 432
2 U.S.C. § 433
2 U.S.C. § 434
11 C.F.R. § 102.8
11 C.F.R. § 102.9
11 C.F.R. § 103.3(a)
11 C.F.R. § 104.7
11 C.F.R. § 104.8
11 C.F.R. § 104.14

I. GENERATION OF MATTER

This Pre-MUR is a sua sponte submission received on May 30, 1989, from Louis E. Wiser, Jr., treasurer of the Carroll County [Maryland] Republican Central Committee Federal Account ("the Federal Account") in which he asked for a review of the Federal Account's records, reports, and activities for 1988 and 1989 for possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). Attachment 1. The submission is rather detailed and contains several attachments. On July 10, 1989, Wiser supplemented the submission with the two attachments noted

with "copy to be forthcoming" in the original submission plus numerous news articles. Attachment 2. The submission raises questions regarding the Federal Account's recordkeeping, reporting, and handling of 24 contributions from persons outside Carroll County, thirteen where the "payee" line of the contributor's check had apparently been altered by the addition of "CCRCCFA"[1] to "Victory '88," ten where persons other than the payor had apparently filled in the payee line, and one where the check was made payable to FS Victory '88 as well as a $5,000 contribution from DRIVE Political Fund of the Teamsters.

This submission was made by Mr. Wiser pursuant to a motion passed at a special meeting of the Carroll County Republican Central Committee ("the Central Committee") on April 18, 1989. The activities included in this submission have been the subject of numerous news articles, thus becoming a matter of some public interest in Maryland. See Attachments 2 and 4. Under Maryland law, the Carroll County Republican Central Committee is the governing body of the Republican State Central Committee of Maryland at the county level for Carroll County and is recognized as such by the state party. Its customary activities include the support of candidates in state elections for which it maintains a state fund and files reports as required with the Maryland State Administrative Board of Election Laws. According to the submission, on July 20, 1988, the Central Committee voted to set up a single federal account for the 1988 election. From

1. "CCRCCFA" represents the Carroll County Republican Central Committee Federal Account.

inception to the 1989 Mid Year report, the Federal Account has reported total receipts of $37,312.08 and total disbursements of $37,234.18 with ending cash on hand of $77.90.

As noted, this submission relates to deficiencies in the recordkeeping and reporting of approximately $14,700 from 24 individuals that were included on reports filed by the Commission plus a $5,000 contribution from DRIVE, the Teamsters' separate segregated fund.[2] In addition, questions are raised regarding the solicitation and forwarding of approximately $6,550 of these contributions.

II. FACTUAL AND LEGAL ANALYSIS

The Act and regulations provide that every person who receives a contribution in excess of $50 for an unauthorized committee shall forward that contribution to the treasurer within 10 days after receiving it along with the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b). The treasurer of a political committee shall keep an account of the identification of every person who makes contributions aggregating in excess of $200 in any calendar year along with the date and amount of such contribution. 2 U.S.C. § 432(c)(3) and 11 C.F.R. § 102.9(a). If a contribution is not returned to the contributor, the treasurer must deposit it within 10 days of receipt. 11 C.F.R. § 103.3(a).

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2. There is also a $1,000 contribution reported as received from the Bentley Re-Elect Committee Inc. '88. According to the minutes of the Central Committee, this represented a $1,000 contribution from Frank Perdue that was mistakenly forwarded to and deposited into the Federal Account. The Federal Account refunded this contribution to the Bentley committee.

The treasurer of a political committee is required to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a). These reports shall itemize the identification of each contributor who makes a contribution aggregating more than $200 in any calendar year along with the date and amount of the contribution. 2 U.S.C. § 434(b)(3)(A). Identification is defined in the Act to mean for an individual the name, mailing address, occupation, and employer. 2 U.S.C. § 431(13). Commission regulations also explain that the date of a contribution for reporting purposes by the recipient committee is the "date of receipt." 11 C.F.R. § 104.3(a)(4)(i). In instances where a person (who is an agent of the committee) receives and forwards a contribution to the treasurer, the treasurer should report the date the contribution was received by the person who forwarded it, as Section 432(b)(2) and Section 102.8(b) require such date to be provided to the treasurer. The Act further provides that when a treasurer shows "best efforts" have been made to obtain necessary contributor information, any report filed shall be deemed in compliance with the Act. 2 U.S.C. § 432(i) and 11 C.F.R. § 104.7.

The Republican National Committee's Victory '88 program was apparently intended to be a separate program conducted by state party officials to fund exempt activities.[3] See Attachment 1 at

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3. Such exempt activities include those on behalf of a party's presidential and vice presidential nominees as well as other party nominees for federal office. Thus, some degree of coordination with the candidates' committees or participation by persons involved in the candidates' campaigns is recognized. Because, however, they are exempt activities, they are not

pages 9-10 of the First General Counsel's Report in MURs 2757 and 2767, signed May 11, 1989. The RNC does not appear to have set up a separate Victory '88 committee at the national level, though it appears to have undertaken some role in coordinating or directing Victory '88 activities. Instead, some states established separate Victory '88 committees, while others apparently conducted Victory '88 activities through their federal accounts. In some instances, subordinate party organizations at the local level also established separate Victory '88 or other federal committees for the 1988 election. In Maryland the Republican State Central Committee used its federal account for its activities relating to the 1988 general election, which reported $426,552 in receipts and $409,995 in disbursements through the end of 1988. Other Victory '88 committees set up in Maryland included Free State Victory '88 (set up by the Baltimore City Republican Central Committee), Baltimore County Victory Fund, Frederick Victory Committee, and Howard County Victory '88.[4]

(Footnote 3 continued from previous page)
subject to the coordinated party expenditure limitations and are not in-kind contributions to the candidates. For the 1988 general election the RNC has reported $8,289,181.95 as coordinated party expenditures on behalf of Bush/Quayle as of December 31, 1988.

4. Free State Victory '88 reported receipts of $70,123 and disbursements of $68,170 in 1988, nearly all of it in the Post-General Election Report. It received a $5,000 transfer from the Carroll County Republican Central Committee Federal Account in 1989. Baltimore County Victory Fund reported receipts of $4,186 and disbursements on $3,463 in 1988. It also received a $5,000 transfer from the Federal Account in 1989. The funds of Free State Victory '88 and Baltimore County Victory Fund were apparently not under the control of the state party, but were

The Carroll County Republican Central Committee did not set up a Victory '88 committee but, as noted, established the Federal Account for purposes of the 1988 general election with Gary Warren Bauer as treasurer.[5] According to the minutes, Sharon Hornberger, the chairwoman of the Central Committee, was contacted in March 1988 by Richard Taylor, Republican National Committeeman and finance chairman for the Bush campaign in Maryland, regarding the possible use of the Federal Account in connection with the fall campaign to receive funds from persons supporting the presidential campaign but not necessarily the state party. She said she contacted Rep. Helen Bentley, chairperson of the Bush campaign in Maryland, regarding the legality of the proposed use of the Federal Account and was told it was legal and had been done in the 1980 and 1984 campaign and would be followed nationwide in 1988.

Of the 24 contributions totaling $14,700 that are the principal focus here, fourteen of these contributions were reported and itemized on the original Post-General Election Report. The remaining 10 were unitemized as they did not exceed

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(Footnote 4 continued from previous page)
controlled by Rep. Helen Bentley and Richard Taylor.

The Frederick Victory Committee reported receipts of $13,666 and disbursements of $12,997 in 1988. Howard County Victory '88 reported receipts of $10,625 and disbursements of $10,517 in 1988.

5. Other counties with federal accounts registered with the Commission in 1988 were Allegany, Anne Arundel, and Prince George's. Allegany reported receipts of $10,755 and disbursements of $6,837. Prince George's reported receipts of $35,049 and disbursements of $36,858, while Anne Arundel reported only a $12 disbursement in 1988.

$200. See Attachment 1 at pages 37-39. Five of the itemized contributions totaling $5,000 and eight of the unitemized ones totaling $1,050 have dates on the check ranging from September 23, 1988, to October 17, 1988. All of these checks were deposited on November 2, 1989, and all of them were made payable to Victory '88 by the payor but have had the payee line altered to add "CCRCCFA." The "CCRCCFA" on all 13 checks is in the same handwriting. In addition, several other contributions are made payable to "CCRCFA 88" in handwriting that differs from that of the payor, indicating that a number of contributor checks may have had the payee line filled out by someone else once it was determined into which account they were to be deposited. One check is made payable to "FS Victory 88," apparently meaning the Free State Victory '88, but was deposited into the Federal Account. See Attachment 1 at pages 40-46. The DRIVE contribution was made payable to CCRCCFA '88.

The submission included correspondence dated May 12, 1989, from Daniel Oliver, one of the 24 contributors. In his letter, he states:

> Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.
>
> Weeks passed without any acknowledgment from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My checks appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. ... And the funds were deposited in a Maryland bank.

> What I want to know is, what happened? And who did it? And why? What is "CCRCCFA"? Is "Victory '88" the same organization as "Victory '88 CCRCCFA"? And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

Oliver's contribution check is dated September 23, 1988, and he states in his letter that he sent it to the RNC on September 26th, but it was not deposited until November 2nd or 3rd.[6]

A number of other contributions, which also had their payee line altered, appear to have been similarly delayed in forwarding

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6. The supplemental submission included a letter from John B. Burcham, Jr., who said he was formerly chairman of the Republican Central Committee for Prince George's County. In his letter, Burcham states:

> While at the Fall Convention, Congresswoman Helen Bentley asked me to attend a fund-raising function several days hence at the home of Kingdom Gould, with Ambassador John Gavin and his wife as special guests. She told me to make out the check to CCRCFA-88 for $1,000. I understood the function to be a fundraiser for George Bush.
>
> At the function, Ambassador Gavin stressed his knowledge of and confidence in George Bush and urged us all to do all we could to assure his election in November. My wife and I certainly went away feeling that we had made a contribution to and had been at a function for the Bush campaign.
>
> ....
>
> Back to my contribution--it was represented to me that I was contributing to the Bush campaign. Since I now have many reasons to doubt that representation, I wish to know: What is/was CCRCFA-88? Was my money spent? If so, what for? If not, where is it now?

Ten other contributions deposited into the Federal Account, made payable to only CCRCFA-88, may have also been raised at this event. Most of the checks for these contributions are dated from October 23rd to 27th and were deposited on November 2nd. Nevertheless, this group of ten appears to have been forwarded to the committee designated in the payee line of the check and deposited within the appropriate time frames. Therefore, no recommendation is made with respect to this group of contributions.

and depositing. In addition to Oliver's contribution, these contributions include those by Shaukat A. Ashai ($1,000), Tariq Mohmood ($1,000), Parvez Shah ($1,000), Ann McLaughlin ($1,000), Peter Zourdos ($100), June Abel ($100), James P. Goldsmith ($150), Andrew Manos ($100), Kenneth Burke ($100), Robert Barnhill ($100), Joseph Payne ($200), John J. Foster, Jr. ($200), and possibly Jayne H. Plank ($500 to FS Victory '88). As noted, the dates of the checks for this group of contributions (totaling $6,550) range from September 23 to October 17 and were not deposited into the Federal Account until November 2nd. Thus, allowing ten days for forwarding and ten days for depositing, it does not appear that this group of 14 checks were either forwarded or deposited in the proper time.

The attached minutes and news reports contain information attributed to Bauer, treasurer of the Federal Account, that the checks were already altered when he received them. The news reports also indicate that Sharon Hornberger, chairwoman of the Central Committee, stated the checks were deposited shortly before and after the election because that is when they came in. She is also quoted in the minutes and news reports as saying the contributions were solicited by Rep. Helen Bentley and Richard P. Taylor on an individual basis and that they controlled the handling of these contributions. There is conflicting information in the minutes regarding whether the contributors knew their contributions would be sent to the Federal Account or had requested that their contributions not go to the state party. Oliver's letter indicates that at least some of the contributors

did not intend to contribute to the Carroll County Federal Account. Therefore, it appears that this group of 14 checks were not forwarded to the intended or proper committee, in this case the Republican State Central Committee of Maryland's federal account, as these checks were made payable to Victory '88 and had the "CCRCCFA" added to them by someone other than the payor (except for the single check made payable to "FS Victory '88").

The minutes and news accounts indicate that these contributions were not reported prior to the election in order to keep information about the financial activity of the Bush campaign in Maryland from the Dukakis campaign, to keep the funds from the control of the Maryland Republican Party's state chairman, and to provide a means for certain individuals to contribute to the Bush campaign without the state party's knowledge. The minutes and news reports also contain statements that the knowledge of these contributions and transactions were kept on a "need to know" basis and apparently known only to Rep. Bentley, Taylor, Sharon Hornberger, Bauer, and Frank Rammes, a member of the Central Committee and chairman of the Bush campaign in Carroll County.[7] These circumstances suggest that the delay in forwarding the contributions in a timely manner and to the proper committee may have been deliberate and done to avoid

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7. The news reports also note that Rep. Bentley, Taylor, and Susan Saum-Wicklein (treasurer of the state party) had allegedly set up a Bush campaign account under their control during the summer in Hagerstown. When state chairman Daniel Fleming reportedly objected, the account was presumably closed and the funds transferred to Annapolis. In the news reports, Rep. Bentley is quoted as saying, "You have more flexibility with an older account, and we were operating a full-speed election."

disclosing them prior to the general election.

As noted above, Bauer reportedly told the Central Committee at its May 4, 1989, meeting that the CCRCCFA was on the checks when he received them. According to the minutes, Hornberger said the funds were solicited and received by Taylor and Rep. Bentley on an individual basis. The minutes are not clear on whether the contributors knew how their contributions were to be handled or to what committee they were to go. Daniel Oliver's letter, however, indicates that some of the contributions may have been forwarded to and received by the RNC, which may have failed to forward them in the proper time frame or to the proper committee. Therefore, there is reason to believe Rep. Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee have violated 2 U.S.C. § 432(b)(2).

In addition, the Federal Account reported the date of the check as the date of the contribution rather than the date of receipt. The submission also notes that Bauer's records have only the names without any other identification for 17 of the 24 contributions. As noted, the 24 contributions totaled $14,700. It further notes that the reports do not provide the occupation or employer for nine[8] of these contributions. Moreover, the submission states that the records do not contain any

8. An amendment to the Post-General Election Report attributed the entire contribution from Tudor Manor Partnership to a single partner and identified his occupation, thus reducing the number to eight. The absence of this information is also notable because Daniel Oliver was chairman of the Federal Trade Commission and Ann Dore McLaughlin was Secretary of Labor at the time they made these contributions.

documentation to show "best efforts" were undertaken to obtain that information (despite the notation of "information requested" on the reports filed with the Commission). Thus, it appears that because these contributions were being routed through the Federal Account and were apparently controlled by Rep. Bentley and Taylor, the treasurer of the Federal Account (at that time Gary Bauer) failed to undertake the necessary steps to maintain complete records of these contributions and to report them properly. Therefore, the reports of the Federal Account cannot be deemed in compliance with the Act on the basis of the "best efforts" provision. As noted earlier, although the information indicates that the contributions came in to the Federal Account only shortly before they were deposited, it remains possible that some of them were received by the Federal Account and not deposited within 10 days as required by Section 103.3(a).[9]

Thus, it appears that the Federal Account and its treasurer have violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a) for failure to keep adequate records of these 24 contributions totaling $14,700, failure to correctly

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9. The submission and news articles also appear to raise questions regarding certain disbursements by the Federal Account. These include approximately $2,973.18 relating to the appearance of former Ambassador John Gavin and Rep. Bentley at a fundraiser in Howard County, $1,000 attributed to travel to the inauguration, $3,832.89 for computer equipment and services, and transfers of $5,000 each to the Baltimore County Victory '88 and the Free State Victory '88. See Attachment 3. Aside from possibly some minor deficiencies in recordkeeping and reporting relating to these disbursements, there does not appear to be any thing improper so far as the making of them is concerned. Therefore, no recommendation is made with respect to these disbursements.

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report them, and failure to deposit them timely. Therefore, this Office recommends that the Commission find reason to believe the Carroll County Republican Central Committee Federal Account violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a).

In addition, we note that the Act clearly places the recordkeeping and reporting requirements on the treasurer. See 2 U.S.C. §§ 432(c) and 434(a)(1). Commission regulations further state that the treasurer shall be personally responsible for the accuracy of reports filed. 11 C.F.R. § 104.14(d). The treasurer is also made responsible for the timely deposit of contributions. 11 C.F.R. § 103.3(a). Therefore, this Office also recommends that the Commission find reason to believe Gary W. Bauer, the former treasurer, violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d). We also recommend that the Commission approve interrogatories and request for documents to Bauer.

We further recommend that the Commission find reason to believe Rep. Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee violated 2 U.S.C. § 432(b)(2) for failure to forward certain contributions (totaling up to $6,550) within 10 days to the proper committee. We also recommend the Commission approve the proposed interrogatories and requests for documents to these respondents.

Finally, we recommend the Commission also approve questions as nonrespondent witnesses to the five persons whose contributions of $1,000 each are at issue in this matter as well as Jayne Plank (whose checks was made payable to FS Victory '88) for records and information in their possession relating to their contributions. We also recommend the Commission approve questions to Sharon Hornberger for her written answers and documents relating to this matter.

III. RECOMMENDATIONS

1. Open a Matter Under Review.

2. Find reason to believe the Carroll County Republican Central Committee violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a).

3. Find reason to believe Gary Warren Bauer violated 2 U.S.C. § 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d).

4. Find reason to believe Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee violated 2 U.S.C. § 432(b)(2).

5. Approve the attached letter and Factual and Legal Analysis to the Carroll County Republican Central Committee and Louis E. Wiser, Jr., as treasurer.

6. Approve the attached letter, Factual and Legal Analysis, and interrogatories and request for documents to Gary Warren Bauer.

7. Approve the attached letters, Factual and Legal Analyses, and interrogatories and request for documents to Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee.

8. Approve the attached letter and interrogatories and request for documents to Sharon Hornberger as a nonrespondent witnesses.

9. Approve the attached letters and interrogatories and requests for documents as nonrespondent witnesses to Daniel Oliver, Shaukat A. Ashai, Tariq Mohmood, Parvez Shah, Ann Dore McLaughlin, and Jayne H. Plank.

8/8/87
Date

Lawrence M. Noble
General Counsel

Attachments:
1. Submission Materials
2. Additional Submission
3. Review of Reports
4. News Reports
5. Proposed Letters(5), Factual and Legal Analysis (5), and interrogatories and request for documents (4) to Respondents
6. Proposed letters and interrogatories and request for documents to nonrespondent witnesses (7)

0043112443

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee	)	Pre-MUR 217 (MUR 2936)
	)	
Gary W. Bauer, former treasurer	)	
	)	
Representative Helen Delich Bentley	)	
	)	
Richard P. Taylor	)	
	)	
Republican National Committee	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 14, 1989, the Commission decided by a vote of 5-0 to take the following actions in PRE-MUR 217:

1. Open a Matter Under Review.

2. Find reason to believe the Carroll County Republican Central Committee violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a).

3. Find reason to believe Gary Warren Bauer violated 2 U.S.C. § 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d).

4. Find reason to believe Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee violated 2 U.S.C. § 432(b)(2).

5. Approve the letter and Factual and Legal Analysis to the Carroll County Republican Central Committee and Louis E. Wiser, Jr., as treasurer, as recommended in the General Counsel's Report dated August 8, 1989.

(continued)

6. Approve the letter, Factual and Legal Analysis, and interrogatories and request for documents to Gary Warren Bauer as recommended in the General Counsel's Report dated August 8, 1989.

7. Approve the letters, Factual and Legal Analyses, and interrogatories and request for documents to Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee as recommended in the General Counsel's Report dated August 8, 1989.

8. Approve the letter and interrogatories and request for documents to Sharon Hornberger as a nonrespondent witnesses as recommended in the General Counsel's Report dated August 8, 1989.

9. Approve the letters and interrogatories and requests for documents as nonrespondent witnesses to Daniel Oliver, Shaukat A. Ashai, Tariq Mohmood, Parvez Shah, Ann Dore McLaughlin, and Jayne H. Plank as recommended in the General Counsel's Report dated August 8, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

11-15-89
Date

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

Received in the Secretariat: Wednesday, August 9, 1989 10:02 a.m.
Circulated to the Commission: Thursday, August 10, 1989 4:00 p.m.
Deadline for vote: Monday, August 14, 1989 4:00 p.m.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sharon W. Hornberger
30 Chase Street
Westminster, MD 21157

RE: MUR 2936

Dear Ms. Hornberger:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. At this time, the Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and Request
for Documents

20040311247

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ann Dore McLaughlin
2918 Garfield Street, N.W.
Washington, D.C. 20008

RE: MUR 2936

Dear Ms. McLaughlin:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and
Request for Documents

2304311249

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, MD 20866

RE: MUR 2936

Dear Dr. Shah:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and
Request for Documents

20040311251

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jayne H. Plank
10005 Frederick Avenue
Kensington, MD 20895

RE: MUR 2936

Dear Ms. Plank:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures
Interrogatories and
Request for Documents

2004031253

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

RE: MUR 2936

Dear Mr. Oliver:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and
Request for Documents

4031125

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, MD 21044

RE: MUR 2936

Dear Shaukat Ashai:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and
Request for Documents

9004031112557

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, MD 20854

RE: MUR 2936

Dear Dr. Mohmood:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached interrogatories and request for documents which request you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information with 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and
Request for Documents

20040311259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis E. Wiser, Jr., Treasurer
Carroll County Republican Central
Committee Federal Account
2810 Gillis Street
Mt. Airy, MD 21771

RE: MUR 2936
Carroll County Republican
Central Committee Federal
Account

Dear Mr. Wiser:

On August 14, 1989, the Federal Election Commission found that there is reason to believe the Carroll County Republican Central Committee Federal Account ("Committee") violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 103.3(a) of Commission regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee. 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 your 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, 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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Helen Delich Bentley
408 Chapelwood Lane
Lutherville, MD 21093

RE: MUR 2936
Helen Delich Bentley

Dear Rep. Bentley:

On August 14, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your 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 you, 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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for Documents

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary Matalin, Chief of Staff
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

Dear Ms. Matalin:

On August 14, 1989, the Federal Election Commission found that there is reason to believe the Republican National Committee ("Committee") violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee. 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 along with answers to the enclosed questions within 15 days of your 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, 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.

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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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for Documents

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Republican National Committee
c/o Mary Matalin, Chief of Staff
310 First Street, S.E.
Washington, D.C. 20003

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. Describe the Victory '88 program and the Republican National Committee's role and activities with respect to the Victory '88 program and the Bush/Quayle campaign.

2. Describe the relationship and role between the Republican National Committee and the Victory '88 program with respect to the Republican State Central Committee of Maryland, Victory '88 committees established in Maryland, and the Bush/Quayle campaign in Maryland, including Rep. Helen Delich Bentley and Richard P. Taylor.

3. Identify all personnel at the Republican National Committee with overall or operational responsibility or role regarding the Victory '88 program and all such personnel who performed any liaison with the Republican State Central Committee of Maryland, Victory '88 committees in Maryland, the Bush/Quayle campaign in Maryland including Rep. Helen Delich Bentley and Richard P. Taylor.

4. Describe the role and activities of the Republican National Committee and its personnel regarding the solicitation, receipt, transmittal, and other handling of contributions for the Victory '88 program that were sent to persons in Maryland, and identify with whom in Maryland the Republican National Committee and its personnel coordinated such activities.

5. With respect to the attached list of persons, state whether the Republican National Committee or its personnel received contributions from any of these persons for the Victory '88 program and, if so, for each such contribution state the date of receipt by the Republican National Committee, the date the contribution was forwarded, and the identity of the person to whom each such contribution was forwarded.

6. State whether the Republican National Committee has had communications after the 1988 general election with any persons in Maryland regarding the handling of contributions for the Victory '88 program or has reviewed any records or reports with regard to such contributions. If so, identify each communication and review.

7. State whether the Republican National Committee received, transmitted,or otherwise handled contributions for the Victory '88 program from persons other than those on the attached list that were sent to persons in the State of Maryland. If so, state the number of such contributions so handled, the aggregate dollar amount of such contributions, and the identity of the person(s) to whom such contributions were forwarded.

8. Provide copies of all documents relevant to your response to the above questions.

Attachment

2004031270

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, Maryland 21044

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, Maryland 20854

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, Maryland 20866

Ann McLaughlin
2918 Garfield Street, N.W.
Washington, D.C. 20008

Jayne H. Plank
10005 Frederick Avenue
Kensington, Maryland 20895

Peter Zourdos
5101 River Road
Bethesda, Maryland 20816

June Abel
408 Scott Drive
Silver Spring, Maryland 20900

James P. Goldsmith
1512 Bolton Street
Baltimore, Maryland 21217

Andrew Manos
6905 Millwood Road
Bethesda, Maryland 20817

Kenneth Burke
103 Park Lane
Baltimore, Maryland 21210

Robert B. Barnhill
6607 Weymouth Court
Baltimore, Maryland 21212

Joseph Payne
2004 Witherspoon Road
Baltimore, Maryland 21212

John J. Foster, Jr.
1510 Dulaney Valley Road
Lutherville, Maryland 21093

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Republican National Committee **MUR:** 2936

The Act and regulations provide that every person who receives a contribution in excess of $50 for an unauthorized committee shall forward that contribution to the treasurer within 10 days after receiving it along with the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).

The Republican National Committee's Victory '88 program was apparently intended to be a separate program conducted by state party officials to fund exempt activities.[1] The RNC does not appear to have set up a separate Victory '88 committee at the national level, though it appears to have undertaken some role in coordinating or directing Victory '88 activities. Instead, some states established separate Victory '88 committees, while others apparently conducted Victory '88 activities through their federal accounts. In some instances, subordinate party organizations at the local level also established separate Victory '88 or other federal committees for the 1988 election. In Maryland the

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1. Such exempt activities include those on behalf of a party's presidential and vice presidential nominees as well as other party nominees for federal office. Thus, some degree of coordination with the candidates' committees or participation by persons involved in the candidates' campaigns is recognized. Because, however, they are exempt activities, they are not subject to the coordinated party expenditure limitations and are not in-kind contributions to the candidates. For the 1988 general election the RNC has reported $8,289,181.95 as coordinated party expenditures on behalf of Bush/Quayle as of December 31, 1988.

Republican State Central Committee used its federal account for its activities relating to the 1988 general election, which reported $426,552 in receipts and $409,995 in disbursements through the end of 1988. Other Victory '88 committees set up in Maryland included Free State Victory '88 (set up by the Baltimore City Republican Central Committee), Baltimore County Victory Fund, Frederick Victory Committee, and Howard County Victory '88.

The Carroll County Republican Central Committee did not set up a Victory '88 committee but, as noted, established the Federal Account for purposes of the 1988 general election with Gary Warren Bauer as treasurer. According to the Central Committee's minutes, Sharon Hornberger, the chairwoman of the Central Committee, was contacted in March 1988 by Richard Taylor, Republican National Committeeman and finance chairman for the Bush campaign in Maryland, regarding the possible use of the Federal Account in connection with the fall campaign to receive funds from persons supporting the presidential campaign but not necessarily the state party. She said she contacted Rep. Helen Bentley, chairperson of the Bush campaign in Maryland, regarding the legality of the proposed use of the Federal Account and was told it was legal and had been done in the 1980 and 1984 campaign and would be followed nationwide in 1988.

Of 24 contributions totaling $14,700, fourteen of these contributions were reported and itemized on the original Post-General Election Report. The remaining 10 were unitemized as they did not exceed $200. Five of the itemized contributions

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totaling $5,000 and eight of the unitemized ones totaling $1,050 have dates on the check ranging from September 23, 1988, to October 17, 1988. All of these checks were deposited on November 2, 1989, and all of them were made payable to Victory '88 by the payor but have had the payee line altered to add "CCRCCFA." The "CCRCCFA" on all 13 checks is in the same handwriting. In addition, several other contributions are made payable to "CCRCFA 88" in handwriting that differs from that of the payor, indicating that a number of contributor checks may have had the payee line filled out by someone else once it was determined into which account they were to be deposited. One check is made payable to "FS Victory 88," apparently meaning the Free State Victory '88, but was deposited into the Federal Account.

In correspondence dated May 12, 1989, from Daniel Oliver, one of the 24 contributors, he states:

> Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.
>
> Weeks passed without any acknowledgment from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My checks appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. ... And the funds were deposited in a Maryland bank.
>
> What I want to know is, what happened? And who did it? And why? What is "CCRCCFA"? Is "Victory '88" the same organization as "Victory '88 CCRCCFA"? And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

Oliver's contribution check is dated September 23, 1988, and he states in his letter that he sent it to the RNC on September 26th, but it was not deposited until November 2nd or 3rd.

A number of other contributions, which also had their payee line altered, appear to have been similarly delayed in forwarding and depositing. In addition to Oliver's contribution, these contributions include those by Shaukat A. Ashai ($1,000), Tariq Mohmood ($1,000), Parvez Shah ($1,000), Ann McLaughlin ($1,000), Peter Zourdos ($100), June Abel ($100), James P. Goldsmith ($150), Andrew Manos ($100), Kenneth Burke ($100), Robert Barnhill ($100), Joseph Payne ($200), John J. Foster, Jr. ($200), and possibly Jayne H. Plank ($500 to FS Victory '88). As noted, the dates of the checks for this group of contributions (totaling $6,550) range from September 23 to October 17 and were not deposited into the Federal Account until November 2nd. Thus, allowing ten days for forwarding and ten days for depositing, it does not appear that this group of 14 checks were either forwarded or deposited in the proper time.

The Central Committee's minutes and certain news reports contain information attributed to Bauer, treasurer of the Federal Account, that the checks were already altered when he received them. The news reports also indicate that Sharon Hornberger, chairwoman of the Central Committee, stated the checks were deposited shortly before and after the election because that is when they came in. She is also quoted in the minutes and news reports as saying the contributions were solicited by Rep. Helen

Bentley and Richard P. Taylor on an individual basis and that they controlled the handling of these contributions. There is conflicting information in the minutes regarding whether the contributors knew their contributions would be sent to the Federal Account or had requested that their contributions not go to the state party. Oliver's letter indicates that at least some of the contributors did not intend to contribute to the Carroll County Federal Account. Therefore, it appears that this group of 14 checks were not forwarded to the intended or proper committee, in this case the Republican State Central Committee of Maryland's federal account, as these checks were made payable to Victory '88 and had the "CCRCCFA" added to them by someone other than the payor (except for the single check made payable to "FS Victory '88").

The minutes and news accounts indicate that these contributions were not reported prior to the election in order to keep information about the financial activity of the Bush campaign in Maryland from the Dukakis campaign, to keep the funds from the control of the Maryland Republican Party's state chairman, and to provide a means for certain individuals to contribute to the Bush campaign without the state party's knowledge. The minutes and news reports also contain statements that the knowledge of these contributions and transactions were kept on a "need to know" basis and apparently known only to Rep. Bentley, Taylor, Sharon Hornberger, Bauer, and Frank Rammes, a member of the Central Committee and chairman of the Bush campaign in Carroll County. These circumstances suggest that the delay in

forwarding the contributions in a timely manner and to the proper committee may have been deliberate and done to avoid disclosing them prior to the general election.

As noted above, Bauer reportedly told the Central Committee at its May 4, 1989, meeting that the CCRCCFA was on the checks when he received them. According to the minutes, Hornberger said the funds were solicited and received by Taylor and Rep. Bentley on an individual basis. The minutes are not clear on whether the contributors knew how their contributions were to be handled or to what committee they were to go. Daniel Oliver's letter, however, indicates that some of the contributions may have been forwarded to and received by the RNC, which may have failed to forward them in the proper time frame or to the proper committee. Therefore, there is reason to believe the Republican National Committee has violated 2 U.S.C. § 432(b)(2).

2004061727

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard P. Taylor
14309 Brickhowe Court
Germantown, MD 20874

RE: MUR 2936
Richard P. Taylor

Dear Mr. Taylor:

On August 14, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your 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 you, 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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for Documents

2003127079

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Richard P. Taylor
14309 Brickhowe Court
Germantown, MD 20874

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. Describe your role and activities with respect to the Victory '88 program and the Bush/Quayle campaign for the 1988 general election in Maryland.

2. With respect to the attached list of persons, state whether you received any contribution for Victory '88 or the Bush/Quayle campaign from any of these persons. If so, for all such persons, state the date you received each contribution, from whom you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution. State whether you provided the person to whom you forward each contribution with the name and address of the contributor and the date of your receipt of the contribution. State whether you provided the person to whom you forwarded each contribution with the occupation or employer of the contributor.

3. Identify the person(s) who added the notation "CCRCCFA" to the contribution checks from Daniel Oliver, Shaukat A. Ashai, Tariq Mohmood, Parvez Shah, Ann McLaughlin, Peter Zourdos, June Abel, James P. Goldsmith, Andrew Manos, Kenneth Burke, Robert Barnhill, Joseph Payne, and John J. Foster, Jr.

4. Identify all persons known to you who handled in any way contributions for the Victory '88 program or the Bush/Quayle campaign made by the persons on the attached list.

5. State whether you requested that the Carroll County Republican Central Committee Federal Account be made available for the deposit and disbursement of contributions in connection with the Victory '88 program or the Bush/Quayle campaign. If so, describe the circumstances regarding the communication(s) and identify the date and person with whom such communication(s) occurred.

6. State whether you directed the disbursement of any funds from the Carroll County Republican Central Committee Federal Account and, if so, identify the disbursements you so directed.

7. Describe the role and participation, if any, by Bush/Quayle '88 in the soliciting, receipt, deposit, and disbursement of the contributions made by the persons on the attached list.

8. List all other contributions you received and forwarded with respect to the Victory '88 program or the Bush/Quayle campaign together with the identity of each contributor, the date you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution.

9. For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state all reasons why each such contribution was forwarded to a committee or person other than the Republican State Central Committee of Maryland.

10. For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state whether the contributor explicitly instructed you to forward it to another committee or person or whether you explicitly informed such contributor that his or her contribution would be forwarded to another committee or person.

11. Provide copies of all documents relating to your responses to the above questions.

Attachment

2004031234

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, Maryland 21044

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, Maryland 20854

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, Maryland 20866

Ann McLaughlin
2918 Garfield Street, N.W.
Washington, D.C. 20008

Jayne H. Plank
10005 Frederick Avenue
Kensington, Maryland 20895

Peter Zourdos
5101 River Road
Bethesda, Maryland 20816

June Abel
408 Scott Drive
Silver Spring, Maryland 20900

James P. Goldsmith
1512 Bolton Street
Baltimore, Maryland 21217

Andrew Manos
6905 Millwood Road
Bethesda, Maryland 20817

Kenneth Burke
103 Park Lane
Baltimore, Maryland 21210

Robert B. Barnhill
6607 Weymouth Court
Baltimore, Maryland 21212

Joseph Payne
2004 Witherspoon Road
Baltimore, Maryland 21212

John J. Foster, Jr.
1510 Dulaney Valley Road
Lutherville, Maryland 21093

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Richard P. Taylor **MUR:** 2936

The Act and regulations provide that every person who receives a contribution in excess of $50 for an unauthorized committee shall forward that contribution to the treasurer within 10 days after receiving it along with the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).

The Republican National Committee's Victory '88 program was apparently intended to be a separate program conducted by state party officials to fund exempt activities.[1] The RNC does not appear to have set up a separate Victory '88 committee at the national level, though it appears to have undertaken some role in coordinating or directing Victory '88 activities. Instead, some states established separate Victory '88 committees, while others apparently conducted Victory '88 activities through their federal accounts. In some instances, subordinate party organizations at the local level also established separate Victory '88 or other federal committees for the 1988 election. In Maryland the

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1. Such exempt activities include those on behalf of a party's presidential and vice presidential nominees as well as other party nominees for federal office. Thus, some degree of coordination with the candidates' committees or participation by persons involved in the candidates' campaigns is recognized. Because, however, they are exempt activities, they are not subject to the coordinated party expenditure limitations and are not in-kind contributions to the candidates. For the 1988 general election the RNC has reported $8,289,181.95 as coordinated party expenditures on behalf of Bush/Quayle as of December 31, 1988.

Republican State Central Committee used its federal account for its activities relating to the 1988 general election, which reported $426,552 in receipts and $409,995 in disbursements through the end of 1988. Other Victory '88 committees set up in Maryland included Free State Victory '88 (set up by the Baltimore City Republican Central Committee), Baltimore County Victory Fund, Frederick Victory Committee, and Howard County Victory '88.[2]

The Carroll County Republican Central Committee did not set up a Victory '88 committee but, as noted, established the Federal Account for purposes of the 1988 general election with Gary Warren Bauer as treasurer.[3] According to the Central Committee's minutes, Sharon Hornberger, the chairwoman of the Central Committee, was contacted in March 1988 by Richard Taylor, Republican National Committeeman and finance chairman for the

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2. Free State Victory '88 reported receipts of $70,123 and disbursements of $68,170 in 1988, nearly all of it in the Post-General Election Report. It received a $5,000 transfer from the Carroll County Republican Central Committee Federal Account in 1989. Baltimore County Victory Fund reported receipts of $4,186 and disbursements on $3,463 in 1988. It also received a $5,000 transfer from the Federal Account in 1989. The funds of Free State Victory '88 and Baltimore County Victory Fund were apparently not under the control of the state party, but were controlled by Rep. Helen Bentley or Richard Taylor.

The Frederick Victory Committee reported receipts of $13,666 and disbursements of $12,997 in 1988. Howard County Victory '88 reported receipts of $10,625 and disbursements of $10,517 in 1988.

3. Other counties with federal accounts registered with the Commission in 1988 were Allegany, Anne Arundel, and Prince George's. Allegany reported receipts of $10,755 and disbursements of $6,837. Prince George's reported receipts of $35,049 and disbursements of $36,858, while Anne Arundel reported only a $12 disbursement in 1988.

Bush campaign in Maryland, regarding the possible use of the Federal Account in connection with the fall campaign to receive funds from persons supporting the presidential campaign but not necessarily the state party. She said she contacted Rep. Helen Bentley, chairperson of the Bush campaign in Maryland, regarding the legality of the proposed use of the Federal Account and was told it was legal and had been done in the 1980 and 1984 campaign and would be followed nationwide in 1988.

Of 24 contributions totaling $14,700, fourteen of these contributions were reported and itemized on the original Post-General Election Report. The remaining 10 were unitemized as they did not exceed $200. Five of the itemized contributions totaling $5,000 and eight of the unitemized ones totaling $1,050 have dates on the check ranging from September 23, 1988, to October 17, 1988. All of these checks were deposited on November 2, 1989, and all of them were made payable to Victory '88 by the payor but have had the payee line altered to add "CCRCCFA." The "CCRCCFA" on all 13 checks is in the same handwriting. In addition, several other contributions are made payable to "CCRCFA 88" in handwriting that differs from that of the payor, indicating that a number of contributor checks may have had the payee line filled out by someone else once it was determined into which account they were to be deposited. One check is made payable to "FS Victory 88," apparently meaning the Free State Victory '88, but was deposited into the Federal Account.

In correspondence dated May 12, 1989, from Daniel Oliver, one of the 24 contributors, he states:

> Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.
>
> Weeks passed without any acknowledgment from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My checks appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. ... And the funds were deposited in a Maryland bank.
>
> What I want to know is, what happened? And who did it? And why? What is "CCRCCFA"? Is "Victory '88" the same organization as "Victory '88 CCRCCFA"? And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

Oliver's contribution check is dated September 23, 1988, and he states in his letter that he sent it to the RNC on September 26th, but it was not deposited until November 2nd or 3rd.

A number of other contributions, which also had their payee line altered, appear to have been similarly delayed in forwarding and depositing. In addition to Oliver's contribution, these contributions include those by Shaukat A. Ashai ($1,000), Tariq Mohmood ($1,000), Parvez Shah ($1,000), Ann McLaughlin ($1,000), Peter Zourdos ($100), June Abel ($100), James P. Goldsmith ($150), Andrew Manos ($100), Kenneth Burke ($100), Robert Barnhill ($100), Joseph Payne ($200), John J. Foster, Jr. ($200), and possibly Jayne H. Plank ($500 to FS Victory '88). As noted, the dates of the checks for this group of contributions (totaling $6,550) range from September 23 to October 17 and were not

deposited into the Federal Account until November 2nd. Thus, allowing ten days for forwarding and ten days for depositing, it does not appear that this group of 14 checks were either forwarded or deposited in the proper time.

The Central Committee's minutes and certain news reports contain information attributed to Bauer, treasurer of the Federal Account, that the checks were already altered when he received them. The news reports also indicate that Sharon Hornberger, chairwoman of the Central Committee, stated the checks were deposited shortly before and after the election because that is when they came in. She is also quoted in the minutes and news reports as saying the contributions were solicited by Rep. Helen Bentley and Richard P. Taylor on an individual basis and that they controlled the handling of these contributions. There is conflicting information in the minutes regarding whether the contributors knew their contributions would be sent to the Federal Account or had requested that their contributions not go to the state party. Oliver's letter indicates that at least some of the contributors did not intend to contribute to the Carroll County Federal Account. Therefore, it appears that this group of 14 checks were not forwarded to the intended or proper committee, in this case the Republican State Central Committee of Maryland's federal account, as these checks were made payable to Victory '88 and had the "CCRCCFA" added to them by someone other than the payor (except for the single check made payable to "FS Victory '88").

The minutes and news accounts indicate that these

contributions were not reported prior to the election in order to keep information about the financial activity of the Bush campaign in Maryland from the Dukakis campaign, to keep the funds from the control of the Maryland Republican Party's state chairman, and to provide a means for certain individuals to contribute to the Bush campaign without the state party's knowledge. The minutes and news reports also contain statements that the knowledge of these contributions and transactions were kept on a "need to know" basis and apparently known only to Rep. Bentley, Taylor, Sharon Hornberger, Bauer, and Frank Rammes, a member of the Central Committee and chairman of the Bush campaign in Carroll County. These circumstances suggest that the delay in forwarding the contributions in a timely manner and to the proper committee may have been deliberate and done to avoid disclosing them prior to the general election.

As noted above, Bauer reportedly told the Central Committee at its May 4, 1989, meeting that the CCRCCFA was on the checks when he received them. According to the minutes, Hornberger said the funds were solicited and received by Taylor and Rep. Bentley on an individual basis. The minutes are not clear on whether the contributors knew how their contributions were to be handled or to what committee they were to go. Therefore, there is reason to believe Richard P. Taylor has violated 2 U.S.C. § 432(b)(2).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary W. Bauer
924 Century Street
Hampstead, MD 21074

RE: MUR 2936
Gary Warren Bauer

Dear Mr. Bauer:

On August 14, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. §§ 103.3(a) and 104.14(d) of Commission regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your 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 you, 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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Gary Warren Bauer
924 Century Street
Hampstead, MD 21074

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. Describe the role and activities of the Carroll County Republican Central Committee Federal Account ("Federal Account") with respect to the Victory '88 program and the Bush/Quayle campaign in Maryland in 1988.

2. Identify all persons who controlled or directed the receipt and disbursement of funds deposited into the Federal Account with respect to the Victory '88 program or the Bush/Quayle campaign, and identify each receipt and disbursement so controlled or directed.

3. With respect to the attached list of persons whose contribution checks were deposited into the Federal Account, state the date you received each contribution and identify the person from whom you received each contribution. State whether you were provided with the name, address, and date of receipt for these contributions by the person who forwarded them to the Federal Account.

4. State whether the notation "CCRCCFA" was included on the "pay to the order to" line of these checks at the time you received them. Identify the person(s) who added "CCRCCFA" to the "pay to the order to" line of these checks.

5. Identify all persons known to you to have handled in any way the checks representing the contributions from the person on the attached list prior to your receiving them.

6. With respect to all contributions in excess of $200 that you received and deposited into the Federal Account, state whether you were provided with the occupation and employer for each contributor. State what efforts you made to obtain the occupation and employer for all contributions in excess of $200 that you deposited into the Federal Account.

7. State all reasons why the reports you filed for the Federal Account reported the date of the check as the date of the contribution rather than the date of receipt, either the date you received the contribution or the date the person who forwarded the contribution to you received it as appropriate.

8. Identify all persons with whom you have had communications subsequent to the 1988 general election regarding the receipt and disbursement of the contributions from the persons on the attached list and describe each communication and the date it occurred.

9. Provide copies of all documents relevant to your responses to the above questions.

Attachment

9004081129 8

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, Maryland 21044

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, Maryland 20854

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, Maryland 20866

Ann McLaughlin
2918 Garfield Street, N.W.
Washington, D.C. 20008

Jayne H. Plank
10005 Frederick Avenue
Kensington, Maryland 20895

Peter Zourdos
5101 River Road
Bethesda, Maryland 20816

June Abel
408 Scott Drive
Silver Spring, Maryland 20900

James P. Goldsmith
1512 Bolton Street
Baltimore, Maryland 21217

Andrew Manos
6905 Millwood Road
Bethesda, Maryland 20817

Kenneth Burke
103 Park Lane
Baltimore, Maryland 21210

Robert B. Barnhill
6607 Weymouth Court
Baltimore, Maryland 21212

Joseph Payne
2004 Witherspoon Road
Baltimore, Maryland 21212

John J. Foster, Jr.
1510 Dulaney Valley Road
Lutherville, Maryland 21093

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Gary Warren Bauer **MUR:** 2936

Under Maryland law, the Carroll County Republican Central Committee is the governing body of the Republican State Central Committee of Maryland at the county level for Carroll County and is recognized as such by the state party. Its customary activities include the support of candidates in state elections for which it maintains a state fund and files reports as required with the Maryland State Administrative Board of Election Laws. According to the submission, on July 20, 1988, the Central Committee voted to set up a single federal account for the 1988 election. From inception to the 1989 March Monthly report, the Federal Account has reported total receipts of $37,266.61 and total disbursements of $36,132.06 with ending cash on hand of $1,155.55.

The Act and regulations provide that every person who receives a contribution in excess of $50 for an unauthorized committee shall forward that contribution to the treasurer within 10 days after receiving it along with the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b). The treasurer of a political committee shall keep an account of the identification of every person who makes contributions aggregating in excess of $200 in any calendar year along with the date and amount of such contribution. 2 U.S.C. § 432(c)(3) and 11 C.F.R. § 102.9(a). If a contribution is not returned to the contributor, the treasurer

must deposit it within 10 days of receipt. 11 C.F.R. § 103.3(a).

The treasurer of a political committee is required to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a). These reports shall itemize the identification of each contributor who makes a contribution aggregating more than $200 in any calendar year along with the date and amount of the contribution. 2 U.S.C. § 434(b)(3)(A). Identification is defined in the Act to mean for an individual the name, mailing address, occupation, and employer. 2 U.S.C. § 431(13). Commission regulations also explain that the date of a contribution for reporting purposes by the recipient committee is the "date of receipt." 11 C.F.R. § 104.3(a)(4)(i). In instances where a person (who is an agent of the committee) receives and forwards a contribution to the treasurer, the treasurer should report the date the contribution was received by the person who forwarded it, as Section 432(b)(2) and Section 102.8(b) require such date to be provided to the treasurer. The Act further provides that when a treasurer shows "best efforts" have been made to obtain necessary contributor information, any report filed shall be deemed in compliance with the Act. 2 U.S.C. § 432(i) and 11 C.F.R. § 104.7.

The Republican National Committee's Victory '88 program was apparently intended to be a separate program conducted by state

party officials to fund exempt activities.[1] The RNC does not appear to have set up a separate Victory '88 committee at the national level, though it appears to have undertaken some role in coordinating or directing Victory '88 activities. Instead, some states established separate Victory '88 committees, while others apparently conducted Victory '88 activities through their federal accounts. In some instances, subordinate party organizations at the local level also established separate Victory '88 or other federal committees for the 1988 election. In Maryland the Republican State Central Committee used its federal account for its activities relating to the 1988 general election, which reported $426,552 in receipts and $409,995 in disbursements through the end of 1988. Other Victory '88 committees set up in Maryland included Free State Victory '88 (set up by the Baltimore City Republican Central Committee), Baltimore County Victory Fund, Frederick Victory Committee, and Howard County Victory '88.[2]

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1. Such exempt activities include those on behalf of a party's presidential and vice presidential nominees as well as other party nominees for federal office. Thus, some degree of coordination with the candidates' committees or participation by persons involved in the candidates' campaigns is recognized. Because, however, they are exempt activities, they are not subject to the coordinated party expenditure limitations and are not in-kind contributions to the candidates. For the 1988 general election the RNC has reported $8,289,181.95 as coordinated party expenditures on behalf of Bush/Quayle as of December 31, 1988.

2. Free State Victory '88 reported receipts of $70,123 and disbursements of $68,170 in 1988, nearly all of it in the Post-General Election Report. It received a $5,000 transfer from the Carroll County Republican Central Committee Federal Account in 1989. Baltimore County Victory Fund reported receipts of $4,186 and disbursements on $3,463 in 1988. It also received a

The Carroll County Republican Central Committee did not set up a Victory '88 committee but, as noted, established the Federal Account for purposes of the 1988 general election with Gary Warren Bauer as treasurer.[3] According to the minutes, Sharon Hornberger, the chairwoman of the Central Committee, was contacted in March 1988 by Richard Taylor, Republican National Committeeman and finance chairman for the Bush campaign in Maryland, regarding the possible use of the Federal Account in connection with the fall campaign to receive funds from persons supporting the presidential campaign but not necessarily the state party. She said she contacted Rep. Helen Bentley, chairperson of the Bush campaign in Maryland, regarding the legality of the proposed use of the Federal Account and was told it was legal and had been done in the 1980 and 1984 campaign and would be followed nationwide in 1988.

Of 24 contributions totaling $14,700 that are the principal focus here, fourteen of these contributions were reported and itemized on the original Post-General Election Report. The

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(Footnote 2 continued from previous page)
$5,000 transfer from the Federal Account in 1989. The funds of Free State Victory '88 and Baltimore County Victory Fund were apparently not under the control of the state party, but were controlled by Rep. Helen Bentley and Richard Taylor.

The Frederick Victory Committee reported receipts of $13,666 and disbursements of $12,997 in 1988. Howard County Victory '88 reported receipts of $10,625 and disbursements of $10,517 in 1988.

3. Other counties with federal accounts registered with the Commission in 1988 were Allegany, Anne Arundel, and Prince George's. Allegany reported receipts of $10,755 and disbursements of $6,837. Prince George's reported receipts of $35,049 and disbursements of $36,858, while Anne Arundel reported only a $12 disbursement in 1988.

remaining 10 were unitemized as they did not exceed $200. Five of the itemized contributions totaling $5,000 and eight of the unitemized ones totaling $1,050 have dates on the check ranging from September 23, 1988, to October 17, 1988. All of these checks were deposited on November 2, 1989, and all of them were made payable to Victory '88 by the payor but have had the payee line altered to add "CCRCCFA." The "CCRCCFA" on all 13 checks is in the same handwriting. In addition, several other contributions are made payable to "CCRCFA 88" in handwriting that differs from that of the payor, indicating that a number of contributor checks may have had the payee line filled out by someone else once it was determined into which account they were to be deposited. One check is made payable to "FS Victory 88," apparently meaning the Free State Victory '88, but was deposited into the Federal Account. The DRIVE contribution was made payable to CCRCCFA '88.

The submission included correspondence dated May 12, 1989, from Daniel Oliver, one of the 24 contributors. In his letter, he states:

> Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.
>
> Weeks passed without any acknowledgment from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My checks appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. ... And the funds were deposited in a Maryland bank.

> What I want to know is, what happened? And who did it? And why? What is "CCRCCFA"? Is "Victory '88" the same organization as "Victory '88 CCRCCFA"? And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

Oliver's contribution check is dated September 23, 1988, and he states in his letter that he sent it to the RNC on September 26th, but it was not deposited until November 2nd or 3rd.[4]

A number of other contributions, which also had their payee line altered, appear to have been similarly delayed in forwarding and depositing. In addition to Oliver's contribution, these

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4. The supplemental submission included a letter from John B. Burcham, Jr., who said he was formerly chairman of the Republican Central Committee for Prince George's County. In his letter, Burcham states:

> While at the Fall Convention, Congresswoman Helen Bentley asked me to attend a fund-raising function several days hence at the home of Kingdom Gould, with Ambassador John Gavin and his wife as special guests. She told me to make out the check to CCRCFA-88 for $1,000. I understood the function to be a fundraiser for George Bush.
>
> At the function, Ambassador Gavin stressed his knowledge of and confidence in George Bush and urged us all to do all we could to assure his election in November. My wife and I certainly went away feeling that we had made a contribution to and had been at a function for the Bush campaign.
>
> ....
>
> Back to my contribution--it was represented to me that I was contributing to the Bush campaign. Since I now have many reasons to doubt that representation, I wish to know: What is/was CCRCFA-88? Was my money spent? If so, what for? If not, where is it now?

Ten other contributions deposited into the Federal Account, made payable to only CCRCFA-88, may have also been raised at this event. Most of the checks for these contributions are dated from October 23rd to 27th and were deposited on November 2nd. Nevertheless, this group of ten appears to have been forwarded to the committee designated in the payee line of the check and deposited within the appropriate time frames.

contributions include those by Shaukat A. Ashai ($1,000), Tariq Mohmood ($1,000), Parvez Shah ($1,000), Ann McLaughlin ($1,000), Peter Zourdos ($100), June Abel ($100), James P. Goldsmith ($150), Andrew Manos ($100), Kenneth Burke ($100), Robert Barnhill ($100), Joseph Payne ($200), John J. Foster, Jr. ($200), and possibly Jayne H. Plank ($500 to FS Victory '88). As noted, the dates of the checks for this group of contributions (totaling $6,550) range from September 23 to October 17 and were not deposited into the Federal Account until November 2nd. Thus, allowing ten days for forwarding and ten days for depositing, it does not appear that this group of 14 checks were either forwarded or deposited in the proper time.

The Central Committee's minutes and certain news reports contain information attributed to Bauer, treasurer of the Federal Account, that the checks were already altered when he received them. The news reports also indicate that Sharon Hornberger, chairwoman of the Central Committee, stated the checks were deposited shortly before and after the election because that is when they came in. She is also quoted in the minutes and news reports as saying the contributions were solicited by Rep. Helen Bentley and Richard P. Taylor on an individual basis and that they controlled the handling of these contributions.

In addition, the Federal Account reported the date of the check as the date of the contribution rather than the date of receipt. Information also indicates that Bauer's records have only the names without any other identification for 17 of the 24 contributions. As noted, the 24 contributions totaled $14,700.

The reports do not provide the occupation or employer for nine[5] of these contributions. Moreover, the records do not contain any documentation to show "best efforts" were undertaken to obtain that information (despite the notation of "information requested" on the reports filed with the Commission). Thus, it appears that because these contributions were being routed through the Federal Account and were apparently controlled by Rep. Bentley and Taylor, the treasurer of the Federal Account (at that time Gary Bauer) failed to undertake the necessary steps to maintain complete records of these contributions and to report them properly. Therefore, the reports of the Federal Account cannot be deemed in compliance with the Act on the basis of the "best efforts" provision. As noted earlier, although the information indicates that the contributions came in to the Federal Account only shortly before they were deposited, it remains possible that some of them were received by the Federal Account and not deposited within 10 days as required by Section 103.3(a).[6]

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5. An amendment to the Post-General Election Report attributed the entire contribution from Tudor Manor Partnership to a single partner and identified his occupation, thus reducing the number to eight. The absence of this information is also notable because Daniel Oliver was chairman of the Federal Trade Commission and Ann Dore McLaughlin was Secretary of Labor at the time they made these contributions.

6. The submission and news articles also appear to raise questions regarding certain disbursements by the Federal Account. These include approximately $2,973.18 relating to the appearance of former Ambassador John Gavin and Rep. Bentley at a fundraiser in Howard County, $1,000 attributed to travel to the inauguration, $3,832.89 for computer equipment and services, and transfers of $5,000 each to the Baltimore County Victory '88 and the Free State Victory '88. See Attachment 3. Aside from possibly some minor deficiencies in recordkeeping and reporting relating to these disbursements, there does not appear to be any

The Act clearly places the recordkeeping and reporting requirements on the treasurer. See 2 U.S.C. §§ 432(c) and 434(a)(1). Commission regulations further state that the treasurer shall be personally responsible for the accuracy of reports filed. 11 C.F.R. § 104.14(d). The treasurer is also made responsible for the timely deposit of contributions. 11 C.F.R. § 103.3(a). Therefore, there is reason to believe Gary W. Bauer, the former treasurer, violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d).

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(Footnote 6 continued from previous page)
thing improper so far as the making of them is concerned.

Martha Ann Sitterding
ATTORNEY AT LAW

ONE COURT PLACE, P.O. BOX 2022
WESTMINSTER, MARYLAND 21157
301-876-6057 301-857-0738

September 8, 1989

VIA FAX 202-376-5280

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

ATTENTION: Jeffrey D. Long

Re:MUR 2936

Dear Mr. Long;

As per our telephone conversation of earlier today this letter will confirm my request for an extension in submitting the responses of my client, Sharon W. Hornberger in the above captioned matter. I am of the understanding that the answers would be due on September 27, 1989, as you believe a 14 day extension would be granted for the cause stated.

The cause for the requested extension is that Mr. Louis E. Wiser, Jr., treasurer of the Carroll County Republican Central Committee was hospitalized in the Carroll County General Hospital on Saturday, September 2, 1989 with a possible heart attack. As he is under the care of his physician it is difficult to obtain all of the records and copies of the records necessary to answer the questions submitted to my client.

Thank you for your consideration in this matter. Should any additional communications be required, please contact me at the above referenced telephone numbers.

Very truly yours,

Martha Ann Sitterding

MARTHA ANN SITTERDING

OGC 3964

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 11 AM 8:32

VENABLE, BAETJER AND HOWARD
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

VIRGINIA OFFICE
SUITE 500
2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

September 7, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 SEP -8 PM 3:12

FEDERAL EXPRESS

Mr. Danny L. McDonald,
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. McDonald:

Congresswoman Bentley has requested me to represent her in connection with the above-captioned matter; I enclose a Statement of Designation of Counsel that she signed on September 4, 1989.

Congresswoman Bentley received your letter of August 22nd on August 29th. She, therefore, has until September 13th to respond to the Interrogatories and to submit other factual and legal materials for the Commission's consideration.

By this letter I respectfully request a brief (12 day) extension of time. If the extra time is allowed, Congresswoman Bentley's response would be due on September 25th.

There are several reasons why a brief extension would be of assistance to me. The intervening Labor Day holiday made it impossible for me to begin work on this matter immediately. Also, two expedited cases that I have been handling in the Circuit Court for Baltimore County, both of which have involved requests for interlocutory injunctions, have taken up almost all of my time. In one of those cases, depositions are being held on almost a daily basis until September 20th, and I am the only lawyer in my office who knows enough about the case to cover the depositions. If you wish me to do so, I will gladly provide you with case citations and other information concerning the matters.

Respectfully,

Benson Everett Legg

BEL:mtm
Enclosure
4500R/44-45

cc: The Honorable Helen Delich Bentley

9004031130

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: Benson Everett Legg

ADDRESS: Venable, Baetjer & Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, Maryland 21201

TELEPHONE: (301) 244-7404

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

Sept. 4 1989
Date

Helen Delich Bentley
Signature

RESPONDENT'S NAME: Helen Delich Bentley

ADDRESS: 408 Chapelwood Lane
Lutherville, MD 21093

HOME PHONE: (301) 561-1777

BUSINESS PHONE: (202) 225-3061 & (301) 337-7222

OGC 3978

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 11 AM 9:36

LAW OFFICES
STONER, PRESTON & BOSWELL, CHARTERED
188 EAST MAIN STREET
POST OFFICE BOX 389
WESTMINSTER, MARYLAND 21157-0389

CHARLES E STONER
CHARLES M PRESTON
RICHARD V. BOSWELL
DAVID H PRATT

TELEPHONE 301
WESTMINSTER 848-7777
BALTIMORE 876-7371
FAX 876-0769

September 8, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 11 AM 11:46

Office of General Counsel
Federal Election Commission
Room 659
999 E. Street, N.W.
Washington, D.C. 20463

Attn: Mr. Jeffrey D. Long

Re: MUR 2936
Gary Warren Bauer

Dear Mr. Long:

As a follow up to our telephone conversation of September 9, 1989, I am writing to respectfully request a 15-day extension of time for filing my client's (Gary Warren Bauer) Answers to Interrogatories which were originally due on September 13, 1989.

The reason for my request is that the present treasurer of the Carroll County Republican Central Committee, Louis Wiser, has or may have certain additional financial records which my client may need to fully answer the propounded Interrogatories. Mr. Wiser, I understand, has recently had a heart attack and, due to his medical condition, I did not want to request the aforementioned data until he has had a few days to recover.

Thank you for your attention to this matter.

Very truly yours,

STONER, PRESTON & BOSWELL, CHARTERED

Richard V. Boswell
Attorney for Gary Warren Bauer

RVB/ced
cc: Mr. Gary Warren Bauer

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 13, 1989

Benson Everett Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, MD 21201-2978

RE: MUR 2936

Dear Mr. Legg:

This is in response to your letter dated September 7, 1989, which we received on September 11, 1989, requesting an extension of 12 days to respond to the interrogatories, request for documents, and finding. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 25, 1989.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2940314

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 13, 1989

Martha Ann Sitterding, Esquire
One Court Place
P.O. Box 2022
Westminster, MD 21157

RE: MUR 2936

Dear Ms. Sitterding:

This is in response to your letter dated September 8, 1989, which we received on September 11, 1989, requesting an extension of 14 days to respond to the interrogatories and request for documents. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 27, 1989.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2004081315

OGC 3989

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 13 AM 10:33

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

WITNESS'S RESPONSES TO

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 13 PM 2:31

DANIEL OLIVER, residing at 3105 Woodley Road, N.W., in the City of Washington, District of Columbia, being duly sworn, deposes and says:

Interrogatory No. 1

Provide all document in your possession relating to your check number 6182, dated September 23, 1988, made payable to "Victory '88 CCRCCFA" and drawn on your account.

Response to Interrogatory No. 1

Attached is a copy of the front and back of my check number 6182, dated September 23, 1988 drawn on my account at the Chemical Bank in New York.

Interrogatory No. 2

State to whom and on what date you delivered or sent this check and the method of delivery or sending.

Response to Interrogatory No. 2

I sent the check by the U.S. Postal Service, and to the best of my recollection I mailed it to someone at the Republican National Committee ("RNC"), at 310 First Street, S.E., Washington, D.C.

2040316-3

Interrogatory No. 3

Describe in detail the circumstances leading up to and surrounding your making of the contribution represented by this check.

Response to Interrogatory No. 3

I chose to make a contribution designed to further the election of George Bush as President. It was my understanding that at that time it was no longer possible to make a contribution directly to the Bush campaign organization. I called the Republican National Committee to find out how best to accomplish my goal of making a contribution to further the election of George Bush, given that I could not make a contribution directly to his campaign organization. I was told that the appropriate action to take was to make a contribution to "Victory '88." I do not recall with whom I spoke at the Republican National Committee.

Interrogatory No. 4

State the purpose for which you made this contribution and to what entity you understood you were making this contribution at the time you made it and describe the basis for such understanding.

Response to Interrogatory No. 4

My purpose in making the contribution was to further the election of George Bush as President. To the best of my recollection, my understanding at the time was that "Victory '88" was an organization engaged in that effort to the extent allowed

by law, but not under the direct control of the Bush election organization. I do not recall who told me that.

Interrogatory No. 5

State whether you have had any communication or discussions with any person(s), other than your immediate family or employees, regarding this contribution. If so, identify with whom and when you had each communication or discussion and describe the nature of each communication or discussion. Provide all documents in your possession relating to all such communications or discussions.

Response to Interrogatory No. 5

Since the time of making the contribution I have discussed the contribution with, to the best of my recollection:

(a) Someone at the Republican National Committee. I called the RNC (in late October, to the best of my recollection) because I had received no acknowledgement of the contribution and I had noticed, from a review my bank statement, that the check had not been negotiated. I wanted to find out if the check had been received. My recollection is that I had to call again the following week to get an answer to my question. The answer was that the check had been received and was accompanied by a complex explanation as to why it had taken the RNC so long to cash the check. I do not recall the explanation, and I do not recall the name of the person I spoke to.

(b) Donald Devine (and probably others whom I do not recall) on or about May 10, 1989. At Mr. Devine's suggestion, as I recall, I also discussed it, on the same day, as I recall, with Mary M. Rose. To the best of my recollection, both of them asked me if I would be willing to write a letter to Mary M. Rose so that she could bring up the matter at a meeting of a Maryland Republican group she was attending within the next few days. They both were concerned that the funds had been used for purposes -- including the furthering of the election of a Democratic candidate -- other than for the election of George Bush as President.

(c) Mary M. Rose, subsequent to the meeting she had attended.

(d) Someone from, as I recall, the General Counsel's office at the Republican National Committee, who expressed his concern that I had written the letter to Mary M. Rose. My recollection is that he suggested that I would be required to testify before the Federal Election Commission, and that he was upset that I had raised the matter and that I could not remember the names of the people I had spoken to at the RNC.

(d) Attached is a copy of a letter I wrote to Mary M. Rose.

Interrogatory No. 6

State whether you wrote "CCRCCFA" on the "pay to the order of" line of the check identified in question 1. If you did not, identify who wrote this notation on the check.

Response to Interrogatory No. 6

I did not write "CCRCCFA" on the "pay to the order of" line of the check, and I do not know who did.

Daniel Oliver

District of :
: SS
Columbia :

Subscribed and sworn to before me this 7th day of September, 1989.

Janet D. O'Connor
Notary Public

My Commission expires _____

JANET D. O'CONNOR
My Commission Expires
July 31, 1993

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

May 12, 1989

Mrs. Mary M. Rose
126 River Drive
Annapolis, Maryland 21403

Dear Mrs. Rose:

Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.

Weeks passed without any acknowledgement from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My check appears to hve been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. (I have enclosed a copy of the front and back of the check: but as always, the back, including the date it was deposited, is a bit hard to read.) And the funds were deposited in a Maryland bank.

What I want to know is, what happened? And who did it? And why? What is "CCRCCFA?" Is "Victory '88" the same organization as "Victory '88 CCRCCFA." And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

I know you will want to clear up these matter, and do so sufficiently publicly to reassure people who might otherwise be discouraged from making contributions in the future.

Sincerely,

Daniel Oliver

DANIEL OLIVER
LOUISE V. OLIVER
3106 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sep 23 19 88 6182

1-12/210

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000 00

One thousand and NO/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO 707

Daniel Oliver

⑆021000128⑆ 967-203139⑈ 6182 ⑈0000100000⑈

NO '88 02
FNB Of MD
052000113

NO '88 03
CHEMICAL BANK
55 WATER ST.
N.Y.C. N.Y.

107-0106-2

OGC 3996

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 13 PM 3:55

STEPTOE & JOHNSON
ATTORNEYS AT LAW
1330 CONNECTICUT AVENUE
WASHINGTON, D.C. 20036
(202) 429-3000
TELEX: 89-2503

RICHARD P. TAYLOR
(202) 429-6459

September 13, 1989

BY HAND

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2936

Dear Mr. Noble:

Enclosed herewith is my response to the interrogatories and request for production of documents in the above matter. If you have any questions or need additional information, please let me know.

Sincerely,

Richard P. Taylor

Enclosures

2004011323

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

RESPONSE TO INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS

The attached affidavit is submitted in response to the interrogatories and request for production of documents received by the undersigned on August 29, 1989 in the above matter.

Respectfully submitted,

Richard P. Taylor
14908 Spring Meadows Drive
Germantown, Maryland 20874
(Note address correction)
Home telephone: 840-5720
Business telephone: 429-6459

2340511-324

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

AFFIDAVIT

District of Columbia)
) ss
City of Washington)

I, Richard P. Taylor, swear that the following statements are true and correct to the best of my knowledge and belief:

The following constitute my answers to the interrogatories and request for production of documents in the above matter served on me August 29, 1989, a copy of which is attached hereto for reference, the answers being numbered in the same manner as the interrogatories and request for production of documents.

1. I served as Maryland Victory '88 Finance Chairman and Maryland Bush/Quayle Finance Chairman for the 1988 general election in Maryland.

2. Every contribution I received during the 1988 general election in Maryland was for Victory '88. All these contributions were forwarded to the Republican State Central Committee of Maryland with the sole exception of the following checks (copies and related documents attached hereto):

Name	Amount
*Parvez Shah, M.D.	$ 1,000.00
*Shaukat A. Ashai	1,000.00
*Tariq Mahmood, M.D.	1,000.00
*Daniel Oliver	1,000.00
Jane G. Irwin	2,500.00
John N. Irwin II	2,500.00
*Ann McLaughlin	1,000.00
*Andrew Manos	100.00
*Peter Zourdos	100.00
*James P. Goldsmith	150.00
*John J. Foster, Jr.	200.00
*Joseph Payne	200.00
*Robert B. Barnhill	100.00
*Kenneth J. Burke	100.00
*June K. Abel	100.00
	$11,050.00

*Checks on list attached to interrogatories.

Hence all contribution checks on the list except Jayne H. Plank were received by me.

All of the above checks, totalling $11,050, were received by me in mid to late October, 1988 and were promptly (well within the 10-day limit) turned over by hand to Congresswoman Helen Bentley for deposit in the Free State Victory '88 Account (set up by the Baltimore City Republican Central Committee).

I received all of the checks from the contributor except those from Daniel Oliver, Mr. and Mrs. Irwin, Ann McLaughlin, Andrew Manos and Peter Zourdos, which were received from Fred Bush.

The name and address of the contributor is on most of the checks and it was my understanding the remaining addresses

3403131326

were available to Mrs. Bentley from campaign records. She was personally aware of the date of receipt of some of the checks and was advised by me with respect to the remainder. The occupation or employer of the contributor with respect to all contributions over $200 was either apparent from the face of the check (M.D.) or was known by Mrs. Bentley (e.g., FTC Chairman Oliver, Secretary McLaughlin, etc.).

3. I do not know who added the notation "CCRCCFA" to the contribution checks listed in this question. I was not aware that such a notation had been added to the checks. As shown by the check copies attached to answer 2 above, none of the checks given to Mrs. Bentley had such a notation on them.

4. Other than myself, the persons known to me were Fred Bush and Mrs. Bentley.

5. I did not request that the Carroll County Republican Central Committee Federal Account be made available for the deposit and disbursement of contributions in connection with the Victory '88 program or the Bush/Quayle campaign. In March, 1988 I contacted Sharon Hornberger, the Chairman of the Carroll County Central Committee, as I did the Chairman of many other county central committees in the state, to ascertain whether the county party maintained a Federal Account. These contacts were for the purpose of determining the existence of all such accounts which might be available both to raise and disburse that county's Victory '88 contributions (the main purpose of the contact) and as a possible supplement to the basic state party account for contributors supporting the presidential campaign but

2 0 0 4 0 3 1 3 2 7

not necessarily the state party. I did not request the actual availability of the Carroll County Federal Account and was not aware it was going to be used. It was my assumption that the funds I turned over to Mrs. Bentley were going to be deposited in the Free State Victory '88 Account.

6. I did not direct the disbursement of any funds from the Carroll County Republican Central Committee Federal Account. I did not direct the disbursement of any funds from any Federal Account in the state other than the Federal Account of the Republican State Central Committee of Maryland, nor did I have control of any Federal Account other than the State Party Account (where my signature was one of the required signatures for disbursements).

7. To my knowledge, Bush/Quayle '88 had no role in the soliciting, receipt, deposit, and disbursement of the contributions made by the persons on the list involved.

8. As indicated in the answer to question 2, all contributions I received during the general election in Maryland were for Victory '88. With the exception of those contributors listed in the answer, all such contributions were forwarded to the Republican State Central Committee of Maryland. The Republican State Central Committee of Maryland has a copy of all such checks and a complete record of the name, address and occupation or employer of each contributor. Checks were either mailed or hand delivered to either the State Party Treasurer or to the State Party Executive Director. To the best of my knowledge, all checks were turned over well within the 10-day

limit; in fact, in many cases they were turned over almost immediately upon receipt because the funds were urgently needed to support the volunteer aspects of the campaign.

9. The contributions listed in the answer to question 2 were turned over to Congresswoman Helen Bentley at her request. I assumed that they would be deposited in the Free State Victory '88 Federal Account in accordance with my understanding of the wishes of the contributors (i.e., to support the campaign but not the State Party).

10. The response to each of the contributions listed in the answer to question 2 is as follows:

a. The medical people (Shah, Ashai, Mahmood) were informed by me that their contributions would be forwarded to another committee other than the Republican State Central Committee of Maryland.

b. The contributors whose contributions were sent to me by Fred Bush (Oliver, the Irwins, McLaughlin, Manos and Zourdos) were, according to my understanding, informed by Fred Bush.

c. The remaining contributors were, according to my understanding, informed by those in the Victory '88 headquarters in Baltimore County or Montgomery County who requested that the checks be sent to me.

3401-3229

11. The relevant documents are attached in response to question 2.

Richard P. Taylor

Subscribed and sworn to before me this 13th day of September, 1989.

Notary Public

My Commission expires: 3/14/92

0040-1330

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Richard P. Taylor
14309 Brickhowe Court
Germantown, MD 20874

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

3931-3540

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040313032

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. Describe your role and activities with respect to the Victory '88 program and the Bush/Quayle campaign for the 1988 general election in Maryland.

2. With respect to the attached list of persons, state whether you received any contribution for Victory '88 or the Bush/Quayle campaign from any of these persons. If so, for all such persons, state the date you received each contribution, from whom you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution. State whether you provided the person to whom you forward each contribution with the name and address of the contributor and the date of your receipt of the contribution. State whether you provided the person to whom you forwarded each contribution with the occupation or employer of the contributor.

3. Identify the person(s) who added the notation "CCRCCFA" to the contribution checks from Daniel Oliver, Shaukat A. Ashai, Tariq Mohmood, Parvez Shah, Ann McLaughlin, Peter Zourdos, June Abel, James P. Goldsmith, Andrew Manos, Kenneth Burke, Robert Barnhill, Joseph Payne, and John J. Foster, Jr.

4. Identify all persons known to you who handled in any way contributions for the Victory '88 program or the Bush/Quayle campaign made by the persons on the attached list.

5. State whether you requested that the Carroll County Republican Central Committee Federal Account be made available for the deposit and disbursement of contributions in connection with the Victory '88 program or the Bush/Quayle campaign. If so, describe the circumstances regarding the communication(s) and identify the date and person with whom such communication(s) occurred.

6. State whether you directed the disbursement of any funds from the Carroll County Republican Central Committee Federal Account and, if so, identify the disbursements you so directed.

7. Describe the role and participation, if any, by Bush/Quayle '88 in the soliciting, receipt, deposit, and disbursement of the contributions made by the persons on the attached list.

8. List all other contributions you received and forwarded with respect to the Victory '88 program or the Bush/Quayle campaign together with the identity of each contributor, the date you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution.

9. For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state all reasons why each such contribution was forwarded to a committee or person other than the Republican State Central Committee of Maryland.

10. For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state whether the contributor explicitly instructed you to forward it to another committee or person or whether you explicitly informed such contributor that his or her contribution would be forwarded to another committee or person.

11. Provide copies of all documents relating to your responses to the above questions.

Attachment

2 0 4 0 3 1 3 5

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, Maryland 21044

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, Maryland 20854

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, Maryland 20866

Ann McLaughlin
2918 Garfield Street, N.W.
Washington, D.C. 20008

Jayne H. Plank
10005 Frederick Avenue
Kensington, Maryland 20895

Peter Zourdos
5101 River Road
Bethesda, Maryland 20816

June Abel
408 Scott Drive
Silver Spring, Maryland 20900

James P. Goldsmith
1512 Bolton Street
Baltimore, Maryland 21217

Andrew Manos
6905 Millwood Road
Bethesda, Maryland 20817

Kenneth Burke
103 Park Lane
Baltimore, Maryland 21210

Robert B. Barnhill
6607 Weymouth Court
Baltimore, Maryland 21212

Joseph Payne
2004 Witherspoon Road
Baltimore, Maryland 21212

John J. Foster, Jr.
1510 Dulaney Valley Road
Lutherville, Maryland 21093

PARVEZ SHAH, M.D. 6-88
BIRJEES SHAH
4405 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 1988

Pay to the Order of Victory 88 $ 1.00

One thousand 00 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

Parvez Shah

⑆055000770⑆ 1272 000294066 8⑈

3 3 1 1 3 3 7

19,050

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL. 301-730-5943
11380 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11 19 88 7-16/520 1278

PAY TO THE ORDER OF VICTORY 88 $ 1000 00

One Thousand and no/100 DOLLARS

COLUMBIA OFFICE
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Fluctuating Rate Bonds

⑆052000168⑆ 0735 00 7894 7108⑈

TARIQ MAHMOOD, M. D.
REAMA MAHMOOD
10701 BALANTRE LANE
POTOMAC, MD 20854

326

10-11 19 88 65-316/550

PAY TO THE ORDER OF VICTORY 88 $ 1000/-

One Thousand Dollars

Equitable PrivateBanking
Equitable Bank, N.A.
Baltimore Maryland 21201

FOR

⑆055003162⑆ 0326 882 0089 4⑈

DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sep 23 19 88 6182

1-12/210

PAY TO THE ORDER OF Victory '88 $ 1000 00

One thousand and no/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO

Daniel Oliver

⑆021000128⑆ 967 203139 6182

JANE G. IRWIN

2244

Oct. 18 19 88 81-993/211

PAY TO THE ORDER OF Free State Victory '88 Fund-------- $ 2500. 00

Two thousand five hundred and no/100 DOLLARS

NEW CANAAN BANK
and trust company
NEW CANAAN, CONNECTICUT

MEMO Contribution

Jane G. Irwin

⑆021109935⑆ 25 1678 2244

1622

JOHN N. IRWIN II

10/18/ 19 88 1-131/210

PAY TO THE ORDER OF Free State Victory'88 Fund-------- $ 2,500.00

Two thousand five hundred and no/100---------- DOLLARS

U.S.Trust
UNITED STATES TRUST CO.
OF NEW YORK
45 Wall Street
New York, N.Y. 10005

MEMO

John N. Irwin II

⑆021001318⑆ 60 7436 1622

VICTORY '88

Republican National Committee

Dick

Here a check for the Sec. of Labor — Be sure to thank your boys Donald - Thks! —

[signature]

9004081113339

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 1988

15-52
540

PAY TO THE ORDER OF Victory '88 $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

Ann McLaughlin

⑆054000522⑆ 01⑈102492611⑈ 92765

George Bush for President

Dick —

A couple of checks —

GHW Bush

PAID FOR BY GEORGE BUSH FOR PRESIDENT

ANDREW MANOS
6905 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

5231

10-15- 1988 — 10-15- 19 88 — 65-234/550

PAY TO THE ORDER OF Victory 88 $ 100 00

One hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR

Andrew Manos

⑈055002346⑈ 42 6242 2⑈ 5231

PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816

2369

10/15 1988 — 65-296/550 36

PAY TO THE ORDER OF Victory 88 $ 100 00

ONE HUNDRED — AND — no/100 DOLLARS

Citizens Bank Of Maryland
RIVERDALE, MD 20737

MEMO

⑈055002969⑈ 280 2804⑈ 500⑈ 2369

P J J 4 0 3 1 1 3 4 0

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10-7 19 88

65-40/521 016

PAY TO THE ORDER OF Victory 88 $ 150.00

one hundred fifty DOLLARS

First National Bank of Maryland
SALISBURY, MARYLAND ACCOUNTING CENTER

FOR

Jam O. Smith

⑆052100408⑆ 059⑈0270 8⑈ 1933

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/520 001

PAY TO THE ORDER OF VICTORY 88 $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

⑆052000061⑆ ⑈301⑈57630⑈ 0631

2 0 0 3 1 1 3 4 1

551

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

9/23 19 88 7-16/520 0367

PAY TO THE ORDER OF Victory 88 $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR Bush for President Joseph and Susan Payne

:052000168: 0551000 1039254"

ROBERT B. OR MARGARET K. BARNHILL
6607 WEYMOUTH COURT PH 301-377-5952
BALTIMORE, MD 21212

1811

10-1 1988 67-1/532

Pay to the Order of Victory 88 $ 100 00

One hundred 00 Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For R B Barnhill

:053200191: 18117" 32 150057 1"

KENNETH J. BURKE
103 PARK LANE
BALTIMORE, MD 21210

10/6/1988 0190

7-16/520

PAY TO THE ORDER OF VICTORY '88 $ 100 00

ONE HUNDRED AND 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO Kenneth J Burke

:052000168: 0190 000 113784 3"

---

2 3 4 0 3 1 1 3 4 2

LEONARD L. ABEL
JUNE K. ABEL

817

65-223
550 01

September 24 19 55

02

PAY TO THE ORDER OF Victory 55 $ 100.

One hundred 00 DOLLARS

Montgomery National Bank

FOR

J. K. Abel

⑈000817⑈ ⑆055002231⑆ 01 007335 06⑈

Daniel Oliver
3105 Woodley Road, NW
Washington, D.C. 20008
Lawyer, Chairman, Federal Trade Commission

20040311-3444

Victory '88

October 21, 1988

Mr. Dick Taylor
Steptoe and Johnson
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Dick:

Enclosed is a $1,000 check for the District's Victory '88 federal account from Daniel Oliver. His address appears on his check, in the event you wish to send thanks.

Please call if you have any questions.

Sincerely,

Fred Bush

9004031-3345

Republican National Committee • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8766
Telex: 701144 • FAX: (202) 863-8820

Victory '88

October 24, 1988

Mr. Richard Taylor
Steptoe & Johnson
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Dick:

Enclosed are two, $2500 checks from the Irwins of New York for Maryland's Victory '88 federal account. I've attached a copy of the incoming correspondence showing Mr. Irwin's office address for your reference in the event you wish to send thanks.

Sincerely,

Fred Bush

2 J 0 4 0 3 1 1 3 4 6

Republican National Committee • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8766
Telex: 701144 • FAX: (202) 863-8820

ROOM 3500
30 ROCKEFELLER PLAZA
NEW YORK, N.Y.
10112

212 698-2500

October 18, 1988

Dear Mr. Bush:

Thank you for your telephone call on the 17th. Because I am near the limit on contributions to those organizations which report federally, I am enclosing my check dated October 18, 1988 for $2,500 and one dated October 18, 1988 from my wife, Jane G. Irwin in the same amount, both payable to the "Free State Victory '88 Fund".

With good wishes for happy results for us all on November 8th,

Sincerely,

John N. Irwin II

Mr. Fred Bush
Republican National Committee
310 First Street S. E.
Washington, D. C. 20003

Enclosures

Employer - Patterson, Belknap, Webb & Tyler

C0040031-3347

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 14, 1989

Richard V. Boswell, Esquire
Stoner, Preston & Boswell, Chartered
188 East Main Street
Post Office Box 389
Westminster, MD 21157-0389

RE: MUR 2936
Gary Warren Bauer

Dear Mr. Boswell:

This is in response to your letter dated September 8, 1989, which we received on September 11, 1989, requesting an extension of 15 days to respond to the interrogatories and request for documents. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 28, 1989.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2003401348

OGC 4017

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1866-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

VIRGINIA OFFICE
SUITE 500
2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

September 14, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 SEP 15 AM 11:23

Mr. Danny L. McDonald,
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. McDonald:

I represent Congresswoman Bentley in the above-referenced matter. This letter is to confirm the meeting that Mr. Jeffrey Long has been kind enough to arrange in Washington on Thursday, September 21, 1989 (2:30 p.m.). I requested the meeting so that I could discuss with the attorneys handling the matter the scope of the interrogatories and the document requests.

Congresswoman Bentley's response to the discovery requests are due on Monday, September 25, 1989. I hereby respectfully request an extension until the following Monday, October 2, 1989. The extension would be a great help to me. I have lost four days this week to depositions in a case now pending in the Circuit Court for Baltimore County. The first part of next week will be consumed by preparations for an all-day hearing in that case, which is scheduled for Wednesday, September 20th. The extension would also give me the opportunity to prepare the discovery responses in light of your Staff's views and recommendations.

Please do not hesitate to call me if you need any additional information.

Very truly yours,

Benson Legg

Benson Everett Legg

BEL:mtm
4500R/56
cc: Jeffrey Long, Esquire
The Honorable Helen Delich Bentley

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 15, 1989

POSTMASTER
Washington, D.C. 20008

RE: MUR 2936

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Ann Dore McLauglin. According to our records, the address of Ann Dore McLaughlin was 2918 Garfield Street, N.W. \ Washington, D.C. 20008 as of 9/1/89.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Envelope

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 15, 1989

POSTMASTER
Burtonsville, MD 20886

RE: MUR 2936

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Parvez Shah, M.D.. According to our records, the address of Parvez Shah, M.D. was 4405 Dustin Road / Burtonsville, MD 20866 as of 9/1/89.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Envelope

2936 11 35

OGC 4037

JAYNE H. PLANK
10005 FREDERICK AVENUE
KENSINGTON, MARYLAND 20895

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 18 AM 9:44

To: Federal Elections Commission

From: Jayne H. Plank

Subj: Response to Interrogatories MUR 2936

Date: September 12, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 18 PM 1:32

1) Copy of check #153, dated October 28, 1989

2) I handed my check to Jackie Phillips at Kingdon Gould's house on arrival for dinner fundraiser with former U.S. ambassador to Mexico Gavin and his wife I don't recall the exact date, but the check is dated 10/28.

3) I received a call from Jackie Phillips and a followup call from Helen Bentley, co-chair of the Bush campaign in Maryland. It was short notice, but I said I would attend and got directions.

4) It was my understanding that it was a contribution to the Republican victory campaign to be used in the Baltimore area to assist Helen Bentley and George Bush I based my understanding on the phone conversations I had with Helen and Jackie that extra effort was needed in Baltimore and money was needed to fund this last minute effort.

5) I have had no reason to discuss this matter. It was strickly a political contribution to help the Republican campaign in Maryland

2004031133

0520-0021-8
0520-0021-8
20[illegible]-8

85-296 01
PAID

7-2010-601

JAYNE H. PLANK 153

10/28 88 85-296/650

PAY TO THE ORDER OF [illegible] $ 50.00

[illegible] DOLLARS

CITIZENS BANK
OF MARYLAND
RIVERDALE, MD. 20737

1000 [illegible]

1:0520029691: 4061 0000 0153 "00000 50000"

[illegible]

OGC 4024

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 18 AM 11:03

Federal Account Treasurer
Carroll Co. Republican Central Committee
2810 Gillis Street
Mt. Airy, Maryland 21771
September 14, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 18 PM 1:31

Office of the General Counsel Attn.: Jeffrey Long
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

RE: MUR 2936 Carroll County Republican Central Committee Federal Account

Dear Sirs:

On September 14, 1989, the Carroll County Republican Central Committee met to discuss the August 22 letter and the "Factual and Legal Analysis" received from the Federal Election Commission.

In response to your letter, the Committee voted to request that the Federal Election Commission conduct a full investigation of our Committee's federal campaign fund activity that led to the Commission's reason to believe finding.

The Committee also voted to request that the notifications, investigations and findings be made public pursuant to 11 CFR 111.21.

The Committee believes that these actions are necessary to answer unresolved questions about what caused the possible violations in the management of the Committee's federal campaign funds. We also believe these actions will help to restore the public's confidence in the integrity of this Committee.

In addition the Committee voted to send with this letter the attachment that contains occupation and employer information on some of the contributors. This enclosed additional information was developed after the receipt of your letter and presented to the Committee by Chairperson Sharon Hornberger.

With this submission, the Committee hereby requests that the remedy of pre-probable cause conciliation be granted to it pursuant to 11 CFR 111.18(d). If you have any questions, please do not hesitate to contact us.

Sincerely,

Louis E. Wiser, Jr.
Federal Account Treasurer

Attachment

2 0 0 4 0 3 1 - 3 5 4

NAME AND ADDRESS	OCCUPATION	EMPLOYER
Daniel Oliver 3105 Woodley Road, N.W. Washington, D.C. 20008	Chairman, Federal Trade Commission	U.S. Govt.
Shaukat A. Ashai 11380 Heathertoe Lane Columbia, MD. 21044	Physician	Columbia Free State MEdical Plan
Tariq Mohmood, M.D. 10701 Balantre Lane Potomac, MD. 20854	physician	self
Parvez Shah, M.D. 4405 Dustin Road Burtonsville, MD. 20866	physician	self
Ann McLaughlin 2918 Garfield Street, N.W. Washington, D.C. 20008	Secretary of Labor	U.S. Govt.
Ruth N. Kraus 10901 Juniper Road Kingsville, MD. 21087	housewife	
John B. Burchham, Jr. 6921 Nashville Road Lanham, MD. 20706	Executive Director	National Liquor Stores Assoc., Inc
W. Dale Hess 3401 Fallston Road Fallston, MD. 21047	real estate developer	self
Jean M. Shannon 5811 Holton Lane Temple Hills, MD. 20748	Administrator	U.S. Govt. DODDS
Jayne H. Plank 10005 Frederick Avenue Kensington, MD. 20895	Consultant	self
Ronald G. Alessi, Sr. 30 Oakway Road Timonium, MD. 21093	Business executive	self

Additional Information Request
Page 2.

NAME AND ADDRESS		OCCUPATION	EMPLOYER
Tudor Manor Partnership 23 Ellendale Street Bel Air, MD. 21014 (need names of partners and division of $2,000 contribution between or among partners)	Ron Burkhead Clyde Hendricks ($1,000 ea)	real estate developers	selves
Peter Zourdos 5101 River Road Bethesda, MD. 20816	$100 contribution	co-owner of business with Mr. Manos, listed below auto dealership	
June Abel 408 Scott Drive Silver Spring, MD. 20900		housewife	
James P. Goldsmith 1512 Bolton Street Baltimore, MD. 21217		retired	retired
Andrew Manos 6905 Millwood Road Bethesda, MD. 20817	$100 contribution	co-owner of business with Mr. Courdos, listed above auto-dealership	
Kenneth Burke 103 Park Lane Baltimore, MD. 21210		Research analyst	Alex Brown and Sons, Inc.
Robert Barnhill 6607 Weymouth Court Baltimore, MD. 21212		Electronics Distributor	self
Joseph Payne 2004 Witherspoon Road Baltimore, MD. 21212		Research analyst	Alex Brown a Sons, Inc.
John J. Foster, Jr. 1510 Dulaney Valley Road Lutherville, MD. 21093		Investment banker	Alex Brown an Sons, Inc.

OGC 4045

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 SEP 18 PM 2:07

Republican
National
Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
J. Courtney Cunningham
Deputy Chief Counsels

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 18 PM 4:28

September 15, 1989

HAND DELIVERED

Mr. Danny L. McDonald, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 2936
Republican National Committee

Dear Chairman McDonald:

As Counsel for the respondents in the above-captioned matter under review, the undersigned respectfully requests an extension in which to answer the complaint received from the Commission. As discussed with Jeffrey Long, respondents received notification from the Commission on August 31, 1989, although the certified letter was not received by the designated individual until September 5, 1989. Accordingly, respondents request that its response now be due on October 6, 1989.

This extension is so that the RNC may respond fully to the Commission's request for records and information. In order to make a thorough search and to be able to locate the necessary information, this extension is needed.

Thank you for your consideration.

Sincerely,

Benjamin L. Ginsberg

cc: Mary Matalin
Chief of Staff

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: Benjamin L. Ginsberg

ADDRESS: Republican National Committee
310 First Street, S.E.
Washington, DC 20003

TELEPHONE: 202/863-8638

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

9/15/84
Date

Signature
Jay C. Banning

RESPONDENT'S NAME: Benjamin L. Ginsberg

ADDRESS: Republican National Committee
310 First Street, S.E.
Washington, DC 20003

HOME PHONE:

BUSINESS PHONE: 202/863-8638

2140311358

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1989

Benjamin L. Ginsberg, Esquire
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

Dear Mr. Ginsberg:

This is in response to your letter dated September 15, 1989, which we received on September 18, requesting an extension of approximately 15 days until October 6, 1989, to respond to the Commission's reason to believe finding and its interrogatories and request for documents. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 6, 1989.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

2004031359

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 SEP 21 AM 11:12

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

September 21, 1989

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2936
Waiver of Confidentiality

On September 18, 1989, this Office received a letter from Louis E. Wiser, Jr., treasurer of the Carroll County Republican Central Committee Federal Account ("Federal Account"), in response to the Commission's findings on August 14, 1989, that there was reason to believe the Federal Account had violated 2 U.S.C. §§ 433(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a).

In this letter, he states that the Committee voted to request the Commission conduct "a full investigation of our Committee's federal campaign fund activity that led to the Commission's reason to believe finding." He further states that the "Committee also voted to request that the notifications, investigations and findings be made public pursuant to 11 C.F.R. § 111.21."

This matter involves four other respondents: Gary W. Bauer, former treasurer of the Federal Account; Rep. Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee. None of these other respondents has requested any waiver of confidentiality. Therefore, the above waiver applies only with respect to the Federal Account.

By making this waiver, the Carroll County Republican Central Committee Federal Account has requested that the Commission not apply the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) to this matter. That section, however, merely provides that any notification or investigation shall not be made public by the Commission without the written consent of the person receiving such notification or the person with respect to whom such investigation is made. By its terms, section 437g(a)(120(A) does not impose an affirmative duty on the Commission to publicize this matter at this time as it pertains to the Federal Account.

2040813360

Therefore, this Office will respond to requests for information subject to the following considerations. First requests must be in writing. Second, such requests would be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in Sunshine Act, and all relevant privileges which would limit or preclude the release of such requested information.

The letter also requests preprobable cause conciliation. At this time, the investigation with respect to the other respondents is proceeding, with several of them requesting extension of time in which to respond. Therefore, this Office recommends that the Commission decline at this time to enter into preprobable cause conciliation until the investigation is completed or further along.

The proposed letter covers both the requested waiver of confidentiality and the request for preprobable cause conciliation.

RECOMMENDATIONS

1. Decline at this time to enter into conciliation with the Carroll County Republican Central Committee Federal Account[1] prior to a finding of probable cause to believe.

2. Approve the attached letter.

Attachments
1. Waiver and Request
2. Proposed Letter

2004031361

---

1. The reason to believe finding was made only with respect to the Committee and did not include Louis E. Wiser, Jr., as treasurer. Instead, reason to believe was found against Gary W. Bauer, the former treasurer. This matter was initiated sua sponte by the Federal Account and Mr. Wiser pursuant to a vote of the Central Committee.

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DELORES R. HARRIS DRH
COMMISSION SECRETARY

DATE: SEPTEMBER 25, 1989

SUBJECT: MUR 2936 - WAIVER OF CONFIDENTIALITY
MEMORANDUM FROM GENERAL COUNSEL
DATED SEPTEMBER 21, 1989

9 0 0 4 0 3 1 1 3 5 2

The above-captioned document was circulated to the Commission on Thursday, September 21, 1989 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	
Commissioner Elliott	
Commissioner Josefiak	XXXX
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for Tuesday, October 3, 1989 at 10:00 a.m.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee Federal Account	)	MUR 2936
	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 3, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2936:

1. Decline at this time to enter into conciliation with the Carroll County Republican Central Committee Federal Account prior to a finding of probable cause to believe.

2. Direct the Office of General Counsel to amend the letter attached to the report dated September 21, 1989, and circulate it for Commission approval on a tally vote basis.

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

Attest:

Oct. 4, 1989
Date

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

2 0 3 1 1 3 6 3

OGC 4113

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 SEP 26 PM 4:06

Martha Ann Sitterding
ATTORNEY AT LAW

~~200 EAST MAIN ST.~~, P.O. BOX 2022
WESTMINSTER, MARYLAND 21157
301-876-6057 301-857-0738

September 25, 1989

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
99 E Street, N.W.
Washington, D.C. 20463

Re: Case MUR 2936

Dear Mr. Noble:

Enclosed herewith please find the Answers to Interrogatories filed by Sharon W. Hornberger in the above referenced case.

Very truly yours,

Martha Ann Sitterding

Martha Ann Sitterding

MAS:nsb

2104081364

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 27 PM 12:14

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

* *

ANSWERS TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

To: Lawrence M. Noble, General Counsel
Federal Election Commission
Washington, D.C. 20463

From: Sharon Hornberger
30 Chase Street
Westminster, Maryland 21157

A. The information supplied in these Answers is not based solely on the knowledge of the executing party, but includes the knowledge of the Party's agents and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the Attorney assisting in the preparation of these Answers and thus does not purport to be the exact language of the executing party.

INTERROGATORY NO. 1

Describe the role and activities of the Carroll County Republican Central Committee Federal Account ("Federal Account") with respect to the Victory '88 program and the Bush/Quayle campaign in Maryland in 1988.

Answer: In answering this Interrogatory and the other eight (8) Interrogatories, it should be noted that my understanding of "The Victory '88 Program" and the "Bush/Quayle Campaign," is that Victory '88 was a title selected by the Republican National Committee to apply to all federal election efforts on behalf of federal Republican candidates in the election year of 1988. This umbrella title included all committees formed at the national, state, county or municipal levels, whether the committee was authorized or unauthorized, which had as its purpose to support a federal Republican candidate. When Bush and Quayle became the Republican nominees for the offices of President and Vice President in the 1988 election, the Bush Committee in Carroll County became a Victory Committee, as the Keyes Committee already was. The Bush/Quayle Campaign in Maryland (hereinafter referred to as "Maryland Bush/Quayle"), to my knowledge, was a Victory '88 Campaign; not only by my understanding of the meaning of the Victory '88 Campaign but in that the leaders of the Victory '88 Campaign were the same as the leaders of the Maryland Bush/Quayle. As a result the Carroll County Republican Central Committee Federal Account (hereinafter referred to as "Federal Account") was established by the Carroll County Republican Central Committee in January, 1988, and became known as a Victory '88 Account.

Sometime in late 1987, the Carroll County Republican Central Committee decided to establish a Federal Account in accordance with the United States Code. The sole purpose of this account was to raise, accept and expend funds on behalf of

federal candidates standing for election in 1988. The account was opened in January, 1988, at Union National Bank, 117 East Main Street, Westminster, Carroll County, Maryland 21157, with Joseph Getty as Treasurer. The money placed in this account had been raised at a straw pole rally conducted in January, 1988, for the sole purpose of accumulating sufficient funds to establish the account. The $1,090.95 from the fundraiser was placed in the account, per the March 17, 1988 Minutes of the Carroll County Republican Central Committee, which are attached hereto and incorporated by reference herein as Exhibit 1.

The reason for said account was in furtherance of the interest of the Carroll County Republican Central Committee, as well as two groups of citizens, one being the Carroll County Bush Committee, the other being the Carroll County Keyes Committee, who chose to raise, accept and expend funds on behalf of the election efforts of the Republican nominees for President and Vice President, i.e. George Walker Bush and J. Danforth Quayle, as well as Alan Keyes, Republican candidate for Senator, and Ken Halsey, Republican candidate for the 6th Congressional District seat in the 1988 race. The role of the Federal Account was to facilitate the easy funding of Carroll County and related efforts on behalf of Bush, Quayle, Keyes, and Halsey. (I do not know of any committee that was formed on behalf of Ken Halsey. I do not know whether any contributions were received on his behalf. I do know he received some funds from this account by virtue of the fact that his name appeared on the literature for the other Republican federal candidates.)

Minutes of the July 20, 1988, Carroll County Republican Central Committee Meeting revealed that the Federal Account was to be the sole account used as a repository for funds raised by various committees on behalf of all Republican candidates standing for election in 1988 within Carroll County. To this end, the account was structured so as to allow for deposits from various Victory '88 Committees. The Treasurer of the Federal Account was to maintain records which indicated what funds were raised and available to the various committees raising the monies so deposited. Attached hereto and incorporated by reference herein as Exhibit 2 are the minutes of the July 20, 1988, Carroll County Republican Central Committee Meeting. To my knowledge, this is how the account was maintained from July of 1988, until April of 1989.

INTERROGATORY NO. 2

Identify all persons who controlled or directed the receipt and disbursement of funds deposited into the Federal Account with respect to the Victory '88 program or the Bush/Quayle Campaign, and identify each receipt and disbursement so controlled or directed.

Answer: Most of the information requested by your Interrogatory No. 2, I do not know personally. I was not in charge of the collection or disbursments of funds for the campaign, as I was not Treasurer, agent of the Treasurer, or record-keeper for any of the groups depositing funds into the Federal Account. To my knowledge, the groups that deposited funds into

the Federal Account were the Carroll County Republican Central Committee, Maryland Bush/Quayle, the Carroll County Bush Committee and the Carroll County Keyes Committee.

I believe that all members of any of these groups were entitled to convey to the Federal Account Treasurer checks for deposit, and anyone authorized by their committee could make requests of the Treasurer for a check for campaign-related expenses. As the Minutes show in Exhibit 2, it is apparent if the group had not raised sufficient funds for the expenses that were requested, that a request could be made to a group of people established by the Carroll County Republican Central Committee to make either a loan or gift of such funds to the various campaigns. My involvement in making deposits into the Federal Account came from the following sources:

a. I was the holder of a post office box key for the Carroll County Republican Central Committee as Chairman of that Committee. There were two other people holding keys to this post office box. They were Frank D. Coleman, Esquire, Secretary of the Carroll County Republican Central Committee and Louis Wiser, Treasurer of the Carroll County Republican Central Committee as of July, 1988. I frequently handled checks coming to this post office box.

b. I handled checks at fundraisers held by the Carroll County Republican Central Committee and by the Carroll County Bush Committee.

c. I handled checks for the sale of fundraising items, such as tee shirts, etc.

d. I handled checks left at the campaign headquarters in Carroll County.

e. I handled checks from Maryland Bush/Quayle.

f. I may have handled checks directly from contributors, but I do not have any specific memory as to who the contributor may have been and the occasion on which the check was given to me. If, in fact, I ever handled any check presented to me in this manner, I do not have a specific recollection of it.

In any event, when I handled a check, I confirmed only that a name and address was on the check. I then gave to the Federal Account Treasurer the check within no less than 24 hours from my first handling the check.

As previously stated, each group making deposits into the Federal Account maintained control of the funds they deposited. I was not a member of the Carroll County Bush Committee, at all times relevant to this inquiry, nor the Carroll County Keyes Committee. I was Chairman of the Carroll County Republican Central Committee from May 5, 1988, and I was Sixth District Coordinator of Maryland Bush/Quayle.

As Chairman of the Carroll County Republican Central Committee, I assisted in making decisions on the expenditure of funds for the headquarters, fundraisers and campaign efforts in Carroll County. What funds were disbursed from the Federal Account on behalf of the Maryland Bush/Quayle Campaign were, to

my knowledge, controlled by Helen Delich Bentley as to the following expenditures:

Checks Written in December, 1988:

a. Check to Ambassador Gavin for his documented expenses as to a fundraiser held by the Maryland Bush/Quayle Campaign prior to the General Election in the amount of $2,012.00.

b. Check to Admiral Limosine Service for services provided to the above-referenced fundraiser.

I wrote out the faces of these checks, per invoices forwarded to the Carroll County Republican Central Committee post office box by the office of Helen Delich Bentley. Gary Bauer, Federal Account Treasurer, signed these checks.

c. Checks to the International Limo Service for mini-vans for use by Marylanders attending the Presidential Inaugural.

I received a telephone call from Helen Delich Bentley's office requesting a deposit check of $500.00. On this check I wrote out the face and Gary Bauer, Federal Account Treasurer, signed it.

d. Invoice submitted by the office of Helen Delich Bentley to Carroll County Republican Central Committee post office box for the remaining balance to International Limo Service reflecting the $500.00 deposit with a $1,000.00 balance due.

I do not know who wrote out the face of the check; however, I am sure Gary Bauer, Federal Account Treasurer, signed

the check, as I did not believe myself to have authority to sign any check on this account and never signed any checks.

Checks written in January, 1989:

e. Telephone call to me from Helen Delich Bentley requesting payment to two (2) Maryland Bush/Quayle staff people who worked at the Maryland Victory '88 Headquarters. One was made out to Leslie Jacoby in the amount of $2,200.00, with an additional check of $432.00 for computer supplies used by her on behalf of Maryland Bush/Quayle. The second check was made out to Marge Newman in the amount of $1,200.00.

From working in the Campaign Headquarters on every Tuesday and Friday during the Campaign, I knew that both of these women were employed and had used computer equipment owned by Leslie Jacoby on efforts solely related to the Bush/Quayle campaign in Maryland. I asked for invoices and time sheets from Helen Delich Bentley and referred the request to Gary Bauer, Federal Account Treasurer, for disbursment.

Checks written in February of 1989:

f. Helen Delich Bentley requested funds be transferred to Baltimore County and Baltimore City in the amount of $5,000.00 each. This request was made in a telephone conversation by Ms. Bentley to me and I conveyed the request to Gary Bauer, Federal Account Treasurer, for disbursement.

Checks written in April, 1989:

g. Helen Delich Bentley requested disbursement of $1,067.00 for postage by telephone conversation. I referred the request to Gary Bauer, Federal Account Treasurer, who drew the check and gave it to me for the purchase of postage, which I did

purchase. I then forwarded the stamps to the office of Helen Delich Bentley.

As to any other disbursements, I have no specific knowledge, and as I kept no records and was never the Treasurer, agent for the Treasurer or recordkeeper for any of these Committees, I have no ability to refresh my recollection.

INTERROGATORY NO. 3

With respect to the attached list of persons who are reported to have had contribution checks deposited into the Federal Account, state the date you received each such contribution and identify the person from whom you received each contribution. State whether you were provided with the name, address, and date of receipt for these contributions by the person who forwarded them to the Federal Account.

Answer: Upon reviewing the attached list of names, of which 14 appear, I have no independent recollection of ever having handled any checks from these people. As I have stated in my Answer to Interrogatory No. 2, when a check was handled by me, I merely verified that it contained a name and address. I then immediately presented the check to the Treasurer. I cannot ever remember handling checks from any of the 14 names listed on the attached sheet. I do not know any of the 14 people personally whose names appear on the attached sheet, and do not deny that I may have handled these checks. At this time, however, I have no way of knowing, either from memory or another source specifically, whether or not these checks were ever in my possession.

INTERROGATORY NO. 4

State whether the notation "CCRCCFA" was included on the "pay to the order to" line of these checks at the time you received them. Identify the person(s) who added "CCRCCFA" to the "pay to the order to" line of these checks.

Answer: Assuming that the checks referred to are from those persons on the attached list and are the 14 in number thereon, as I have stated in my Answer to Interrogatory No. 3, I have no independent recollection of ever having these checks in my possession. If these checks were either handed to me directly from the writers at a given function, I did not know these people, and would merely look at the check to determine that it had a name and address before presenting it to Mr. Bauer, Federal Account Treasurer. If the checks were received through the post office box of the Carroll County Republican Central Committee, my procedure was merely the same. If a third party handed these checks to me to be given to Mr. Bauer, similarly I merely confirmed that the checks contained names and addresses on them and then delivered them to Mr. Bauer, Federal Account Treasurer. On no occasion did I attempt to verify any information contained on the face or reverse portion of the checks before presenting them to Mr. Bauer, as I believed I had no obligation or duty to do so under the existing laws.

INTERROGATORY NO. 5

Identify all persons known to you to have handled in any way the checks representing the contributions from the person on the attached list prior to your receiving them.

Answer: As previously indicated in my Answers to Interrogatories Nos. 3 and 4, I do not know that I ever handled any of the checks from those persons listed on the attached sheet containing 14 names. As I previously indicated in my Answers to Interrogatory No. 2, checks were handled by me from various sources. It is impossible for me to recall all persons from whom I received the checks in the seven (7) fashions noted in Answer to Interrogatory No. 2. I do not know if these checks were ever in my possession, and therefore, I cannot identify all persons or, for that matter, any person who handled these checks prior to them coming to me to be handled.

INTERROGATORY NO. 6

State how these contributions were solicited and received and identify all persons who solicited or received them.

Answer: Assuming that you are referring to the attached sheet containing 14 names as to these contributions, I do not have any personal knowledge as to any of the 14 names contained thereon. To my knowledge, I have never met these people socially or professionally. I certainly have no knowledge of how they were either solicited for contributions or how contributions were received from them.

INTERROGATORY NO. 7

State whether you were requested to make the Federal Account available for receipts and disbursements of funds with respect to the Victory '88 Program or Bush/Quayle Campaign in Maryland in 1988, and if so, identify the person(s) making this

request and the date of such request. Identify all person(s) with whom you discussed this proposed use of the Federal Account and the date of each discussion and describe each discussion.

Answer: From its inception, the Federal Account was available and was established for the purpose of being an account to aid the Victory '88 Campaign, including Maryland Bush/Quayle. I did not handle this account with the exception that my name appears on the bank card dated August, 1988, in that my name replaced the name of Jerry Barnes as Chairman of the Carroll County Republican Central Committee. All activity was conducted by the various Treasurers, who were:

a. from January, 1988 through February, 1988 - Joseph Getty;

b. from February, 1988 through July, 1988, C. Nelson Warfield;

c. from July, 1988 through April, 1989, Gary Bauer;

e. from April, 1989 to the present, Louis Wiser.

In an effort to comply with this Committee, I will, however, provide the following information regarding the deposits of Maryland Bush/Quayle funds into the Federal Account, although I don't believe any question is specifically addressed to this issue.

In the month of March, 1988, at the State Convention in Baltimore, during a Hospitality Suite Cocktail Hour, I was approached by Dick Taylor, Maryand National Committeeman and Finance Director of Maryland Victory '88, who asked me if Carroll

County had opened a Federal Account. Knowing that there had been a concerted effort by Mr. Taylor to have Maryland counties open Federal Accounts, I thought nothing of this question and responded by merely saying, "yes." Mr. Taylor then asked if the account would be available for "our" use. I believe that some comment was made about checks from outside the county, but I am not sure of the wording at this time and cannot be specific. I do know that I made an inquiry as to whether or not the deposit of out-of-county checks was a proper use, and Mr. Taylor assured me that such was legal and was the common practice and procedure that was used in Victory '80, Victory '84, and would be used again in Victory '88. No other discussion about the possible use of the Federal Account by the state occurred until October 19, 1988, when Congresswoman Helen Delich Bentley, called me at home. During this period, I was at State Headquarters in Timonium two (2) days per week, those days being Tuesdays and Fridays. Helen Delich Bentley was Chairperson of Maryland Victory '88 for the Bush/Quayle Campaign of Maryland. I had frequent contact with her.

Mrs. Bentley indicated that she understood from Dick Taylor that Carroll County had a Federal Account. I responded, "Yes, Carroll County did have a Federal Account." Helen Delich Bentley indicated to me that she and Dick Taylor were raising funds, which I believed was appropriate, considering that both were National Committee people. Mrs. Bentley indicated she wanted to deposit some of these funds into accounts close to the Headquarters. She indicated that there was a need for one (1)

day turnaround time on checks. Knowing my close proximity to the Headquarters and knowing that I was going to be in Headquarters as frequently as possible, she asked if I could provide that one (1) day turnaround time. I indicated that it would be possible, but I wanted to check with the Committee (meaning the Carroll County Republican Central Committee). Mrs. Bentley said that she did not want this discussed with the Carroll County Republican Central Committee generally, and believed it was a need-to-know basis in order to keep the Dukakis forces from being able to trace Bush funds. Mrs. Bentley expressed a desire to only advise people involved in the Bush Campaign. There were only two (2) people involved in the Bush Campaign who were on the Carroll County Republican Central Committee. They were Frank Rammes and me. I spoke with Mr. Rammes and Mr. Bauer, the Treasurer of the Federal Account, on the same day as Mrs. Bentley's telephone call. We discussed the ability to deposit these funds into the Federal Account. Mr. Bauer indicated that he had three (3) separate funds in the account presently. The Carroll County Republican Central Committee, the Carroll County Bush Committee and the Carroll County Keyes Committee. He indicated there would be no problem to put a Maryland Bush/Quayle fund into this account as well.

On the following Tuesday or Friday, I am not sure of the exact day, Congresswoman Helen Delich Bentley, called me at the Headquarters and requested that I pick up checks from her. I went to her house and met with a woman by the name of Sandy, whose last name I believe is Morgan, who was copying checks. I

asked her where the checks were and Sandy said, "I am getting them ready now." Sandy then handed me a group of checks. I looked at the checks for several seconds and noted that they all contained names and addresses and were of recent dates. I knew the checks numbered more than five (5) but I do not recall the number or any of the names that were on them. I drove from Mrs. Bentley's house to Mr. Bauer's house and gave Mr. Bauer the checks.

On October 28, 1988, Helen Delich Bentley again asked me to pick up some checks and put them into the Federal Account. I met Mrs. Bentley at her Towson office. Mrs. Bentley gave to me an envelope which was sealed. I took the envelope and drove to Gary Bauer's house and handed the unopened envelope to him.

INTERROGATORY NO. 8

Identify all persons with whom you have had communications subsequent to the 1988 general election regarding the receipt and disbursement of the contributions from the persons on the attached list and describe each communication and the date it occurred.

Answer: As I previously answered in my Answers to Interrogatories Nos. 3, 4, 5 and 6, I do not know any of the people contained on the attached list, either personally or professionally. I do not know whether I have ever handled these checks. Therefore, it is impossible for me to determine if I ever discussed the receipt and disbursements of these specific checks.

INTERROGATORY NO. 9

Provide copies of all documents relevant to your responses to the above questions.

Answer: Attached are Exhibits 1 and 2, as well as a complete set of documents regarding the Federal Account as obtained from Louis Wiser, Treasurer of the Federal Account, by me.

Martha Ann Sitterding

Martha Ann Sitterding
One Court Place
Westminster, Maryland 21157
876-6057 - 857-0738
Attorney for Sharon Hornberger

UNDER THE PENALTY OF PERJURY, I do hereby declare and affirm that the facts and statements contained herein are true and accurate to the best of my knowledge, information, and belief.

Sharon Hornberger

Sharon Hornberger

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of September, 1989, a copy of the aforegoing Answers to Interrogatories and Request for Product of Documents was mailed, postage prepaid, to Lawrence M. Noble, Esquire, General Counsel, Federal Election Commission, Washington, D.C. 20463, and at the time of mailing I was 18 years of age or older.

Martha Ann Sitterding

Martha Ann Sitterding

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CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE
MINUTES FOR MARCH 17, 1988

MEMBERS PRESENT: Jerry Barnes, Sharon Hornberger, Don Taylor, Joe Getty, Frank Coleman, Frank Rammes.

The meeting was held at Chairman Barnes' home and was called to order at approximately 7:45 p.m..

OLD BUSINESS:

Secretary's Report: The minutes of March 3, 1988, indicate in the Treasurer's Report Section that Mr. Warfield is the current Treasurer of the Committee and that no report was given because of his absence. There was some discussion regarding when Mr. Warfield takes office, since the audit of the financial books of the Committee has yet to be made as required by the Motion passed by the Committee, and discussed in Item 5, New Business, of the said Minutes. Further, it was pointed out that the said Item 5 does not reflect that an Audit Committee was formed, which consisted of Mr. Taylor and Mr. Rammes. A Motion was made by Ms. Hornberger that the minutes of March 3, 1988, be amended to read simply that no Treasurer's Report was given, and that the Minutes of March 17, 1988, reflect that the books of the Committee have been handed over to the Audit Committee, which Motion was seconded by Mr. Rammes, and unanimously approved.

Treasurer's Report: Mr. Getty reported that the Operating Fund balance was $2,004.51, and the Federal Account balance was $1,090.95.

The following items were discussed and actions taken:

1. Precinct Organization - Mr. Getty had typed the information prepared by Mr. Taylor regarding district and precinct organization. This information was to be distributed to the Committee members by Ms. Hornberger for their analysis and input at a later date. Mr. Taylor said he would proceed with finding interested persons to fill the positions proposed by his organizational plan.

2. Finances - Mr. Getty had typed the information prepared by Mr. Taylor regarding financial plans for the Committee. This information was to be distributed to the Committee members by Ms. Hornberger for their analysis and input at a later date.

3. Voter Registration - A Motion was made by Mr. Rammes that the Committee obtain the alphabetical listing of all registered voters in the County (i.e. both Parties), by district and precinct, which Motion was seconded by Ms. Hornberger, and unanimously approved.

EXHIBIT 1

NEW BUSINESS:

1. Booster Newsletter - Mr. Getty has prepared a draft newsletter for the Booster Club members, which would be entitled "The American Sentinel," a copy of which was distributed to the Members. A lengthy discussion followed regarding information to place in the newsletter, and Mr. Getty is to return at a future meeting with a further refined draft.

2. Committee Liaisons - Mr. Taylor suggested that liaisons be established with the Republican Central Committees of Baltimore, Frederick and Howard Counties since our representatives' districts overlapped. This suggestion was adopted by the Committee and Ms. Hornberger was appointed as the liaison for the Baltimore County Republican Central Committee, and Mr. Taylor and Mr. Rammes were appointed as the liaisons for the Frederick and Howard County Republican Central Committees.

The meeting was adjourned at approximately 11:00 p.m..

P0040311382

CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE
MINUTES FOR JULY 20, 1988

MEMBERS PRESENT:
Sharon Hornberger, Don Taylor, Joe Getty, Frank Rammes and Lou Wiser.

The meeting was held at Chair-person Hornberger's house and was called to order at approximately 7:45 p.m.

OLD BUSINESS:

Secretary's Report: Mr. Coleman not being present, there was no secretary's report submitted.

Treasurer's Report: Mr. Warfield not being present, there was no treasurer's report submitted. Chairperson Hornberger stated that she had spoken with Mr. Warfield by phone today and made arrangements for the treasurer's books to be turned over to Mr. Wiser.

The following items were discussed and actions taken:

1. Crab Feed Tickets.
   Mr. Taylor described the list of ticket distributors and proposed telephone calls to be made to check on distribution. He will contact Mr. Warfield and Mr. Jerry Barnes about their tickets.

2. Publicity for the Crab Feed.
   Mr. Getty presented several options for publicizing the Crab Feed through the newspapers, by direct mail and by newsletter. Mr. Rammes described a direct mail solicitation proposed by the Bush committee in Carroll County. Mr. Taylor asked for a clarification of the separate roles of the Bush committee and the Central Committee. He also recommended that the Central Committee outline exactly what we plan to do in the fall and prepare a budget for doing so, so that we have a clear goal in fundraising. Ms. Hornberger and Mr. Rammes described the efforts to date of the Bush committee in planning for the fall campaign. A lengthy discussion ensued on the role of the two committees and the structuring of the federal account.

   Mr. Rammes moved that the Committee authorize Mr. Getty to spend funds to produce and print a newsletter to promote the Crab Feast, the fall campaign and the Booster Club. Seconded by Mr. Taylor. This newsletter will be sent to the Committee's master mailing list. Motion passed unanimously.

   Mr. Rammes made a second motion that, if the funds are available, Mr. Getty be authorized to send the newsletter along with a cover letter to the list of persons who registered Republican in 1987. Seconded by Mr. Taylor. Motion passed unanimously.

3. Donations from Clubs.
   Mr. Getty proposed that Treasurer Wiser attend the September club meetings to appeal to the club for contributions for the fall campaign.

4. Voter Registration Ad.

EXHIBIT 2

The camera-ready layout ad was submitted to the Carroll County Times by Mr. Getty and is awaiting payment. It was decided to add a box advertising the crab feed to the bottom of this ad.

5. Report of Meeting with Board of Elections.
Mr. Rammes gave a report on the meeting to raise before the Board of Election Supervisors about inconsistencies in the treatment of the Republicans and Democrats in voter registration drives. The Board admitted that no Democrats have taken the training course in 1988. The Board will send letters to the Democratic Central Committee and Carroll County Democratic Club to require Democratic compliance with the voter registration regulations.

6. Federal Account.
A final summary of the discussion over the federal account was presented by Chairperson Hornberger. It was determined that there will be one, single federal account. The funds will be dedicated to the committee that raised that portion of the funds, with the line of authority for disbursement resting with the committee that raised those funds. If a committee needed funds in addition to those that they had raised, a federal account committee of four persons will be established to have authority over such a disbursement. This federal account committee will consist of the Central Committee treasurer, the federal account treasurer, and a desiginated member of each committee. Motion made by Mr. Getty. Seconded by Mr. Taylor. Motion passed unanimously.

Meeting was adjourned at 11:30 p.m.

Joe Getty.
Acting Secretary

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-1

OCT 12 '93

Gary Warren Bauer, Treasurer
Carroll County Republican Central
Committee - Federal Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: Statement of Organization

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Your Statement of Organization discloses the type of your committee as being the principal campaign committee of George Bush for President. Please note that George Bush for President Inc. is the campaign committee of this candidate. While the Act precludes a candidate from forming more than one principal campaign committee, you may qualify as an "authorized committee". The Act defines an authorized committee as being "any political committee that is authorized by a candidate to incur expenses on behalf of such candidate". The term "authorized committee" includes the candidate's principal campaign committee designated in accordance with 11 CFR 102.12, any political committee authorized in writing by the candidate in accordance with 11 CFR 102.13 and any political committee not disavowed by the candidate pursuant to 11 CFR 100.3(a)(3). (11 CFR 9002.1(a)). Please clarify the actual type of your committee.

-Please clarify your relationship, if any, with the Republican State Central Committee of Carroll County and the Republican State Central Committee of Maryland - Federal which appear to be affiliated committees. For further guidance on the question of affiliation, please refer to 11 CFR 100.5(g).

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Paul W. Dickson
Reports Analyst
Reports Analysis Division

9004031 1336

OCT 22 AM 9:08

Carroll County Republican Central
Committee-Federal Account
P.O. Box 2108
Westminster, Maryland 21157
FEC# C00232603

October 20, 1988

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

Dear Gentlemen:

This letter is to notify you that I need to amend the Statement of Organization that was submitted on September 17, 1988. I had indicated that this committee was a principal campaign committee which it was not.

I wish to amend the Statement of Organization from line 5(a) to 5(d). The line 5(d) should read "This committee is a subordinate committee of the Republican Party."

This committee is supporting all Republican candidates for the offices President, Senate, and the House in Maryland 6th Congressional District.

In reference to your letterof October 12, this committee is the Carroll County Republican Central Committee and its members set on the Republican Central Committee of Maryland. This committee established a federal account to keep monies raised to support Republican candidates separate from its normal operating account.

Thank you for your patience and cooperation. I hope this letter will correct the errors in the original Statement of Organization.

Yours truly,

Gary W. Bauer
Treasurer

FEC:gwb

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-2

FEB 8 1989

Gary Warren Bauer, Treasurer
Carroll County Republican
Central Committee Federal
Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: 12 Day Pre-General Report (1/1/88-10/27/88)

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to

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influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Please provide the totals for Line 11(a)(iii), Columns A and B of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Hageman

Todd S. Hageman
Reports Analyst
Reports Analysis Division

9004031332

SCHEDULE A — Itemized Receipts

Carroll County Republican Central Committee-Federal Account

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (mo., day, year)	Amount
Westminster Republican Women's Club 1601 Postmans Valley Rd. Westminster, MD. 21157		9/12/88	$ 200.00
South Carroll Republican Club 2810 Gillis Rd. Mt. Airy, MD. 21771		9/28/88	$ 200.00
Tri-District Republican Club P.O. Box 471 Finksburg, MD. 21048		9/29/88	$1055.00
Carroll County Republican Club 934 Leister's Church Rd. Westminster, MD. 21157		9/29/88	$1400.00
Taneytown Republican Women's Club [illegible] Sullivan Rd. [illegible]minster, MD. 21157		10/22/88	$150.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

March 2, 1989

Gary Warren Bauer, Treasurer
Carroll County Republican
Central Committee Federal
Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: 12 Day Pre-General Report (1/1/88-10/27/88)

Dear Mr. Bauer:

On February 8, 1989 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 21, 1989 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your amended report deletes several contributions from unregistered organizations that were disclosed on Schedule A supporting Line 12 of your original report. Please clarify whether these contributions were deposited into your committee's federal account. If the contributions were deposited, they should be disclosed on your report, and appropriate action should be taken. If they were not deposited please notify the Commission of the disposition of these funds.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Todd S. Hageman on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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P 9 0 4 0 3 1 1 3 2 1

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
89 MAR 20 AM 11:54

Carroll County Republican
Central Committee
Federal Account
924 Century Street
Hampstead, Maryland 21074

March 13, 1989

Mr. Todd S. Hageman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Account No. C00232603

Dear Mr. Hageman:

Pursuant to our conversation of March 13, 1989 regarding the contributions referred to in your letter of March 2, I will need additional time to compile the information to justify these contributions to the FEC.

Thank you again for your advice and assistance in regards to this matter.

I look forward to your response on this matter.

Sincerely,

Gary W. Hauer
Treasurer
239-8[illegible]

2004031392

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-2

Gary Warren Bauer, Treasuer
Carroll County Republican Central
Committee-Federal Account
P.O. Box 2108
Westminster, MD 21157

FEB 15 1989

Identification Number: C00232603

Reference: Year End Report (1/1/88-12/31/88)

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has filed a report which contains financial activity already disclosed on another report. Overlapping coverage dates create difficulties in accounting for cash flow from one report to another. Please amend this report by including only the financial transactions that occurred between 11/22/88 and 12/31/88. 2 U.S.C. §434(b).

-The beginning cash balance of this report should equal the ending balance of your 30 Day Post-General report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Hageman

Todd S. Hageman
Reports Analyst
Reports Analysis Division

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 MAR 13 AM 9:22

Carroll County Republican
Central Committee
Federal Account Treasurer
904 Country Street
Hampstead, Maryland 21074

March 7,1989

Mr. Todd S. Hageman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Account No. C00232603

Dear Mr. Hageman:

Pursuant to our conversation of March 7, 1989 at 11:00 A.M., I am requesting that our report filing status be changed from monthly to quarterly during the non-election time period.

Thank you for your advice and assistance in regards to this matter.

I look forward to your conformation letter.

Sincerely,

Gary W. Bauer
Treasurer
239-8309

2 3 0 4 0 3 8 1 3 9 4

Carroll County Republican
Central Committee
Federal Account
924 Century Street
Hampstead, Maryland 21074
C00232603

April 18, 1989

Mr. Todd S. Hageman
Report Analyst
Report Analysts Division
Federal Electiom Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Change of Treasurer

Dear Mr. Hageman:

This letter is to notify you that effective April 18, 1989; I will no longer be the Treasurer of the Carroll County Republican Central Committee - Federal Account.

The new Treasurer will be Mr. Louis Wiser.

All future correspondence should be directed to: Mr. Louis Wiser Jr
2810 Gillis Road
Mt. Airy, Maryland 21771

I would like to take this opportunity to thank you for all of your assistance.

Sincerely,

Gary W. Bauer

Louis Wiser

2004031395

REAMA MAHMOOD
[redacted] BALANTRE LANE
[redacted] AC, MD 20854

10. 11. 19 88 [redacted] 326

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 1000/-

One Thousand dollars DOLLARS

Equitable PrivateBanking Equitable Bank, N.A. Baltimore, Maryland 21201

FOR _____ [signature]

1:055003162 1: 0326 882 0089 4 1"

DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 88 6182

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000 00

One thousand and NO/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO _____ [signature]

1:021000128 1: 967 203139 6182

LEONARD A. KRAUS
RUTH N. KRAUS
10901 JUNIPER ROAD
KINGSVILLE, MARYLAND 21087

10-23 19 88 3877

PAY TO THE ORDER OF C.C.R C.F.A - 88 $ 1000.00

One thousand 00/100 DOLLARS

SUDBROOK LANE OFFICE
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21208

FOR Bush for President Ruth N Kraus

1:052000168 1: 3877 000 1316 4 1"

LAWRENCE R. RACHUBA 2642

10-25 19 88

PAY TO THE ORDER OF C.C.R.C.F.A - '88 $ 1000 00

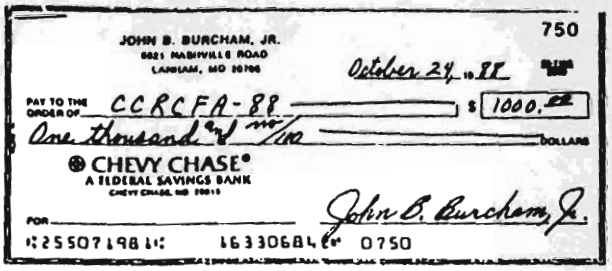
One thousand and 00/XX DOLLARS

TEN LIGHT STREET OFFICE
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR _____ [signature]

1:052000168 1: 2642 000 9039 824 1"

900403113976



JOHN B. BURCHAM, JR.
8021 NASHVILLE ROAD
LANHAM, MD 20706

750

October 24, 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 1000.00

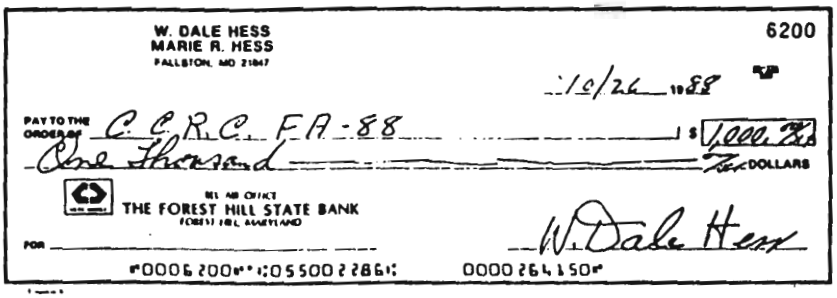
One thousand & no/100 DOLLARS

CHEVY CHASE
A FEDERAL SAVINGS BANK
CHEVY CHASE, MD 20815

FOR

John B. Burcham, Jr.

:255071981: 1633068 4 0750



W. DALE HESS
MARIE R. HESS
FALLSTON, MD 21047

6200

10/26 1988

PAY TO THE ORDER OF C.C.R.C. FA-88 $ 1,000.00

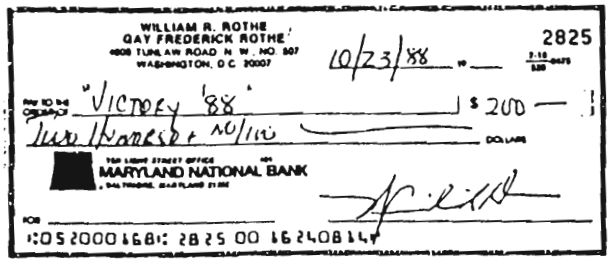
One Thousand DOLLARS

THE FOREST HILL STATE BANK
FOREST HILL, MARYLAND

FOR

W. Dale Hess

⑈0006200⑈ :055002286: 0000264150⑈



WILLIAM R. ROTHE
GAY FREDERICK ROTHE
4808 TUNLAW ROAD N.W., NO. 807
WASHINGTON, D.C. 20007

2825

10/23/88

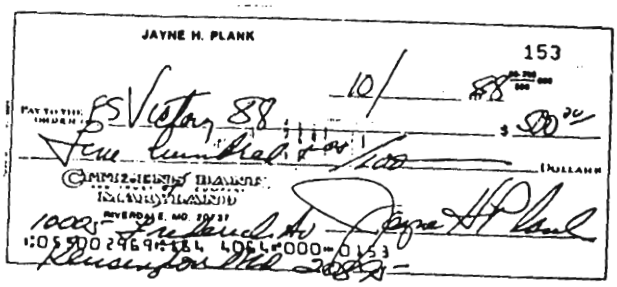
PAY TO THE ORDER OF "Victory '88" $ 200 —

Two Hundred & no/100 DOLLARS

MARYLAND NATIONAL BANK

FOR

:052000168: 2825 00 16240814⑈



JAYNE H. PLANK

153

10/ 88

PAY TO THE ORDER OF "Victory 88" $ 200.00

Two hundred & no/100 DOLLARS

COMMERCIAL BANK
RIVERDALE, MD. 20737

1000 Fruitland Ave Jayne H Plank

:055002969: 164 4064 000 0153

Princess Anne MD 21853

P 0 0 4 0 0 3 1 1 3 9 7

9 3 0 4 0 8 1 1 3 9 8

DEPOSIT TICKET

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2106
WESTMINSTER, MD 21157

DATE 11-2 19 88

CASH		
CHECKS 741	1000	00
TOTAL FROM OTHER SIDE		
TOTAL	1000	00

Union National Bank

⑈001858⑈ ⑆055000615⑆ ⑈1070106 2⑈

GORDON L. SMITH
BARBARA SMITH
12711 EAST DEVONFIELD DRIVE
BALDWIN, MARYLAND 21013

3848

October 41 88 88 340/550

PAY TO THE ORDER OF Victory '88 $ 200.00

Two Hundred and 00/100 DOLLARS

Equitable Equitable Bank, N.A. Baltimore, Maryland

FOR Contribution

⑆052000896⑆ 3848 798 0088 7⑈

BENTLY RE-ELECT COMMITTEE INC. 88
P. O. BOX 10810
TOWSON, MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 1000 00

One Thousand 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
BALTIMORE, MARYLAND

FOR Check from Franklin Perdue Dept in error Margaret E. Mullen

⑈0000 1078⑈ ⑆052000618⑆ ⑈6 25729 1⑈

HENRY A. ROSENBERG, JR.
Chairman Central Committee
1st Legislative District

SIGNET BANK

2759

Oct. 24 19 88

PAY TO THE ORDER OF Victory '88 $ 1,000.00

One thousand and 00/100 DOLLARS

FOR

⑈002759⑈ ⑆052000016⑆ ⑈306-07956⑈

...ELECT COMMITTEE INC. 88
P. O. BOX 10619
TOWSON, MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88

One Thousand $ 1000 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
5020 YORK ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093 84

FOR Check from Franklin Perdue Deposit in error Margaret E. Mullen

⑈0000 1078⑈ ⑆052000618⑆ ⑈625729⑈

C 0 0 4 0 8 1 1 3 9 9

9 J 0 4 0 3 1 1 4 0 0

DRIVE POLITICAL FUND
20 LOUISIANA AVE., N.W.
WASHINGTON, D.C. 20001

10154

October 11, 19 88

PAY TO THE ORDER OF C.C.R.C.F.A. - '88 $ 5,000.00

Five Thousand Dollars and No Cents DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

William D. Quarles
William J. McCarthy

Contribution - Federal Account

#010154# :054000522: 025101241#

TUDOR MANOR PARTNERSHIP
20 GLENDALE ST.
BEL AIR, MD 21014

525

11-7 19 88

PAY TO THE ORDER OF C.C.R.C.F.A.-'88 $ 2,000.00

TWO THOUSAND 00 CTS DOLLARS

Bank of Maryland
Harford County
Bel Air, MD 21014

Bank Funds Required

#000525# :055002299#: 01008 70#

SIGNET BANK
Maryland

7578

11/7 19 88

PAY TO THE ORDER OF C.C.R.C.F.A.-88 $ 500.00

FIVE HUNDRED DOLS 00 CTS DOLLARS

#007578# :052000016:#343-8207957#

811

LEO[illegible] L. ABEL
JUNE K. ABEL

for Scott Jr.
Silver Spring, Md 20904

September 24 19 88 55-223/550 01

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100.

One hundred 00/100 DOLLARS

Montgomery Mutual Bank

FOR

L. Abel

⑈000817⑈ ⑆055002231⑆ ⑈01⑈007335⑈06⑈

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10-7 19 88 55-40/521 610

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 150.00

one hundred fifty 00/100 DOLLARS

First National Bank of Maryland
SALISBURY, MARYLAND ACCOUNTING CENTER

FOR

James P. Goldsmith

⑆052100408⑆ 059⑈0270 8⑈ 1933

AMERICAN EXPRESS MONEY ORDER

Pentagon Federal Credit Union 04-388,304,036

Box 1432 — Arlington, Virginia 22313

PAY THE SUM OF NOT GOOD OVER $1,000.

THE SUM 250 DOLS 00 CENTS

Date Oct 27 19 88

Pay to the order of CCRCFA 88

Sean M Shannon 5811 Holtsford Ln Temple Hills Md 20748

SENDER'S NAME AND ADDRESS

JOHN D.

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 ⑈388304036 6⑈

ANDREW MANOS
6905 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

OCT 10 1988

5231

10-15 19 88 S 55-734/550

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

One hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR

Andrew Manos

⑆055002346⑆ 42 1242 2⑈ 5231

---

9 0 0 4 0 3 1 1 4 0 1

2369

5101 RIVER ROAD
BETHESDA, MARYLAND 20816

10/15 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

ONE HUNDRED AND NO/100 DOLLARS

Citizens Bank Of Maryland

MEMO

:055002969: 280 2804 500 2369

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 1988

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

:054000522: 01 10249 26 92765

PARVEZ SHAH, M.D.
BIRJEES SHAH
4405 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 1988

Pay to the Order of Victory 88 CCRCCFA $ 1,000.00

One thousand and 00/100 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

:055000770: 1272 000294066

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL. 301-730-5943
11380 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11 19 88

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 1000 00

One Thousand and no/100 DOLLARS

COLUMBIA OFFICE
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Election contribution

:052000168: 0735 00 7894 7108

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2 3 0 4 0 3 1 1 4 0 2

[redacted] J. BURKE
[redacted] PARK LANE
BALTIMORE, MD 21210

10/6/19[redacted] 0190

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100.00

One Hundred and 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO _____

:052000168: 0190 000 [redacted]

ROBERT B. OR MARGARET K. BARNHILL
6607 WEYMOUTH COURT PH 301-377-6952
BALTIMORE, MD 21212

1811

10-1 1988

Pay to the Order of Victory 88 CCRCCFA $ 100.00

One hundred Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For _____

:053200019: 1811 [redacted]

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21203

FOR Gift for president Joseph and Susan Payne

:052000168: 0551000 [redacted]

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/320 001

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 200.00

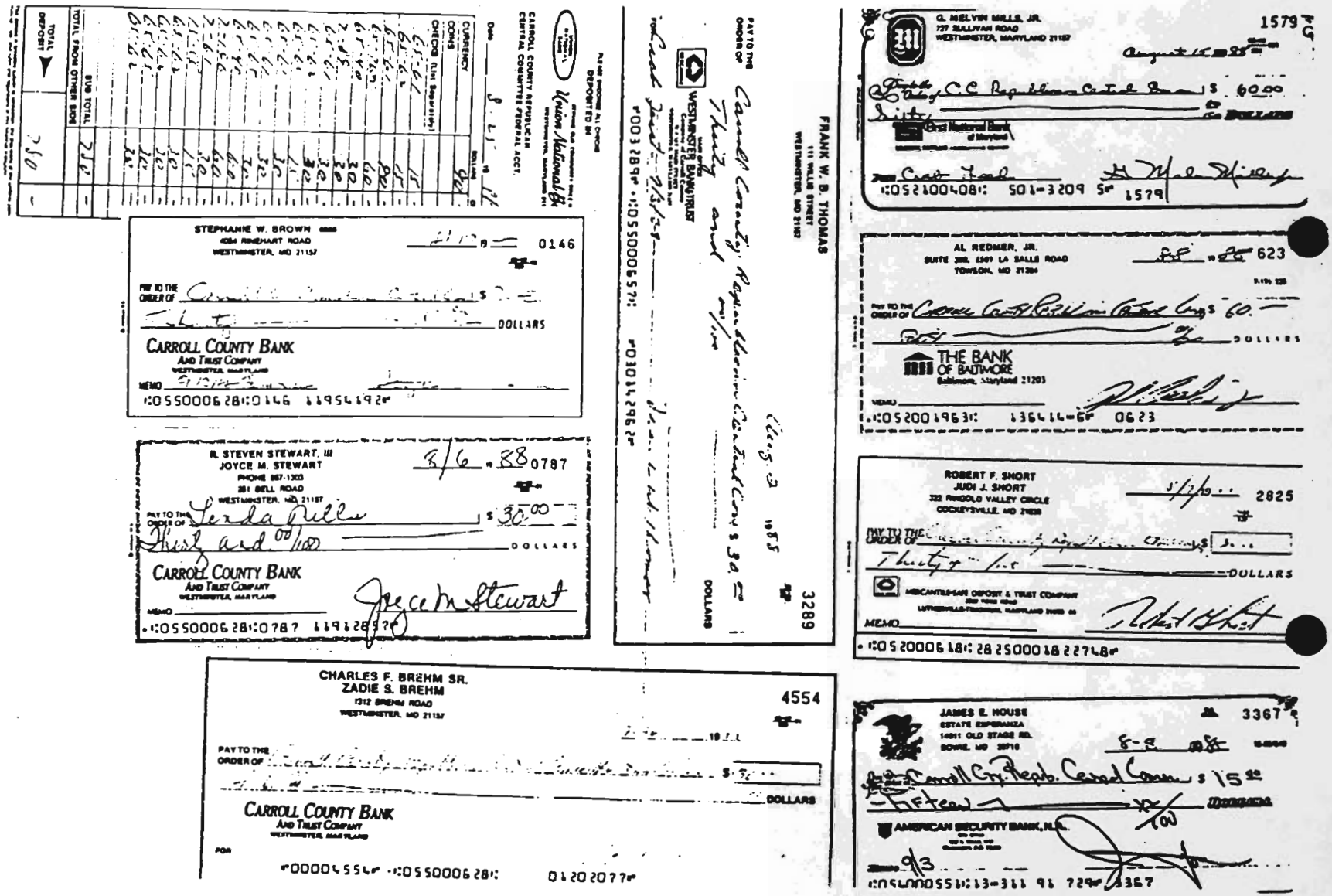
TWO HUNDRED AND 00/100 DOLLARS

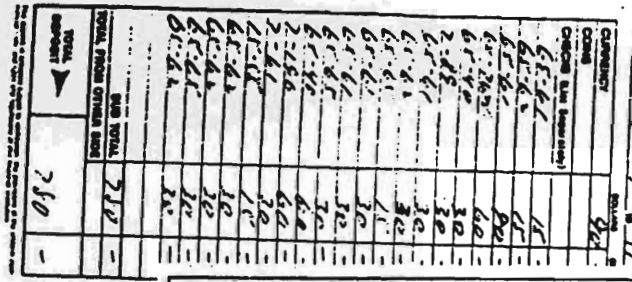
UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

:052000016: [redacted] 0631

[redacted] 0040311403

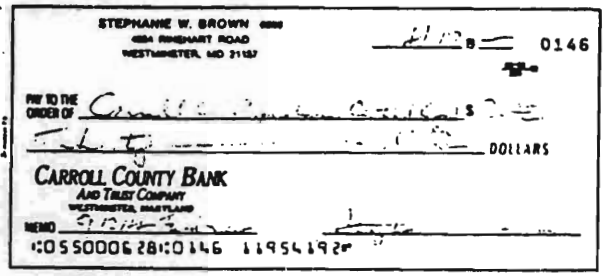




CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE-FEDERAL ACCT.

Union National Bank

CURRENCY		
COINS		
CHECKS (List Separately)		
TOTAL FROM OTHER SIDE		
SUB TOTAL	330	-
TOTAL DEPOSIT	330	-



STEPHANIE W. BROWN
4884 RINEHART ROAD
WESTMINSTER, MD 21157

8-11 19 88 0146

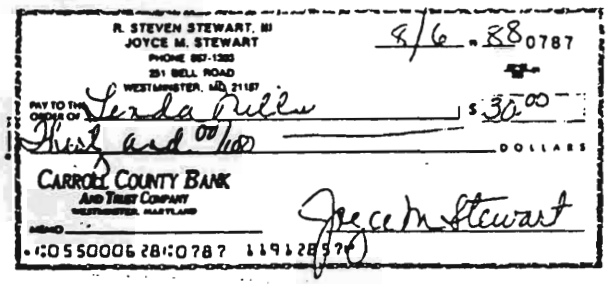
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 30.00

Thirty and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO Primary Election

:0550006281:0146 11954192



R. STEVEN STEWART, III
JOYCE M. STEWART
PHONE 857-1383
251 BELL ROAD
WESTMINSTER, MD. 21157

8/6 19 88 0787

PAY TO THE ORDER OF Linda Miller $ 30.00

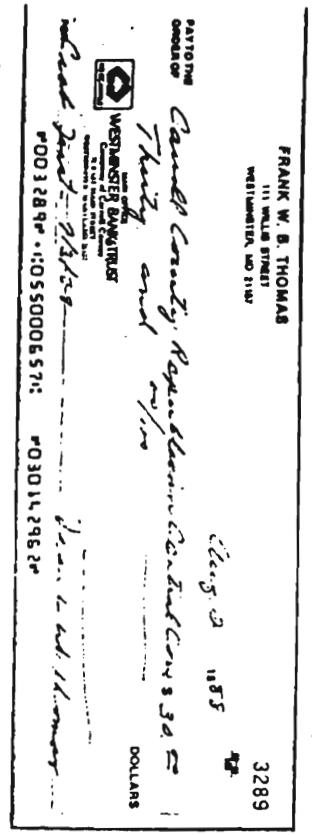
Thirty and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO

Joyce M. Stewart

:0550006281:0787 11912857



FRANK W. B. THOMAS
111 WILLS STREET
WESTMINSTER, MD 21157

3289

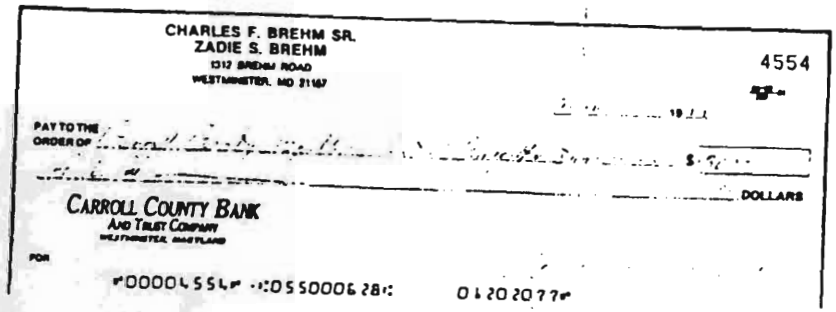
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 30.00

Thirty and 00/100 DOLLARS

WESTMINSTER BANK & TRUST
MAIN OFFICE
WESTMINSTER, MARYLAND

FOR Central Committee

:0032894: :055000657: 0301429624



CHARLES F. BREHM SR.
ZADIE S. BREHM
1312 BREHM ROAD
WESTMINSTER, MD 21157

4554

19 11

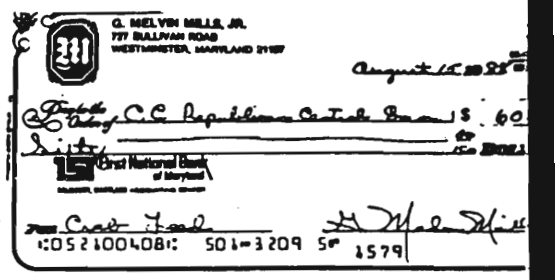
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 30.00

Thirty and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

FOR

:00004554: :055000628: 01202077



G. MELVIN MILLS, JR.
737 SULLIVAN ROAD
WESTMINSTER, MARYLAND 21157

August 12 19 88

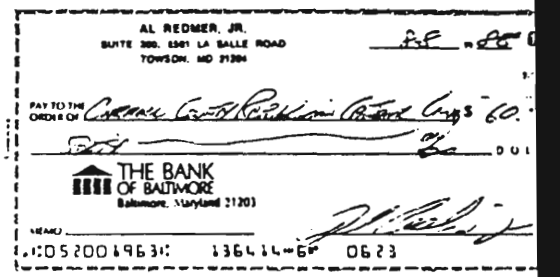
Pay to the Order of C.C. Republican Central Committee $ 60.00

Sixty and 00/100

First National Bank of Maryland

For Cent Fund

:0521004081: 501-3209 5# 1579



AL REDMER, JR.
SUITE 300, 1301 LA SALLE ROAD
TOWSON, MD 21204

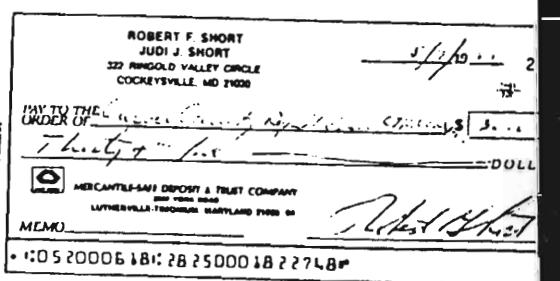
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 60.00

Sixty and 00/100 DOLLARS

THE BANK OF BALTIMORE
Baltimore, Maryland 21203

MEMO

:0520019631: 1364-14-6# 0623



ROBERT F. SHORT
JUDI J. SHORT
322 RINGOLD VALLEY CIRCLE
COCKEYSVILLE, MD 21030

5/10 19 88 2

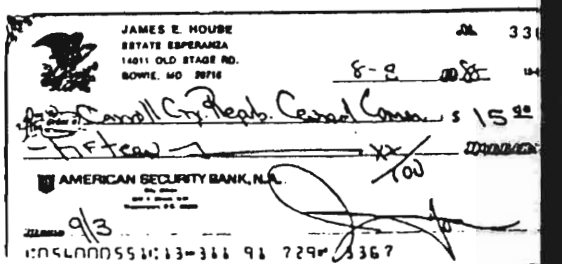
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 30.00

Thirty and 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
LUTHERVILLE-TIMONIUM, MARYLAND 21093

MEMO

:0520006181: 28250001822748#



JAMES E. HOUSE
ESTATE ESPERANZA
14011 OLD STAGE RD.
BOWIE, MD 20716

8-9 19 88 331

Pay to the Order of Carroll Cty. Reps. Central Comm. $ 15.00

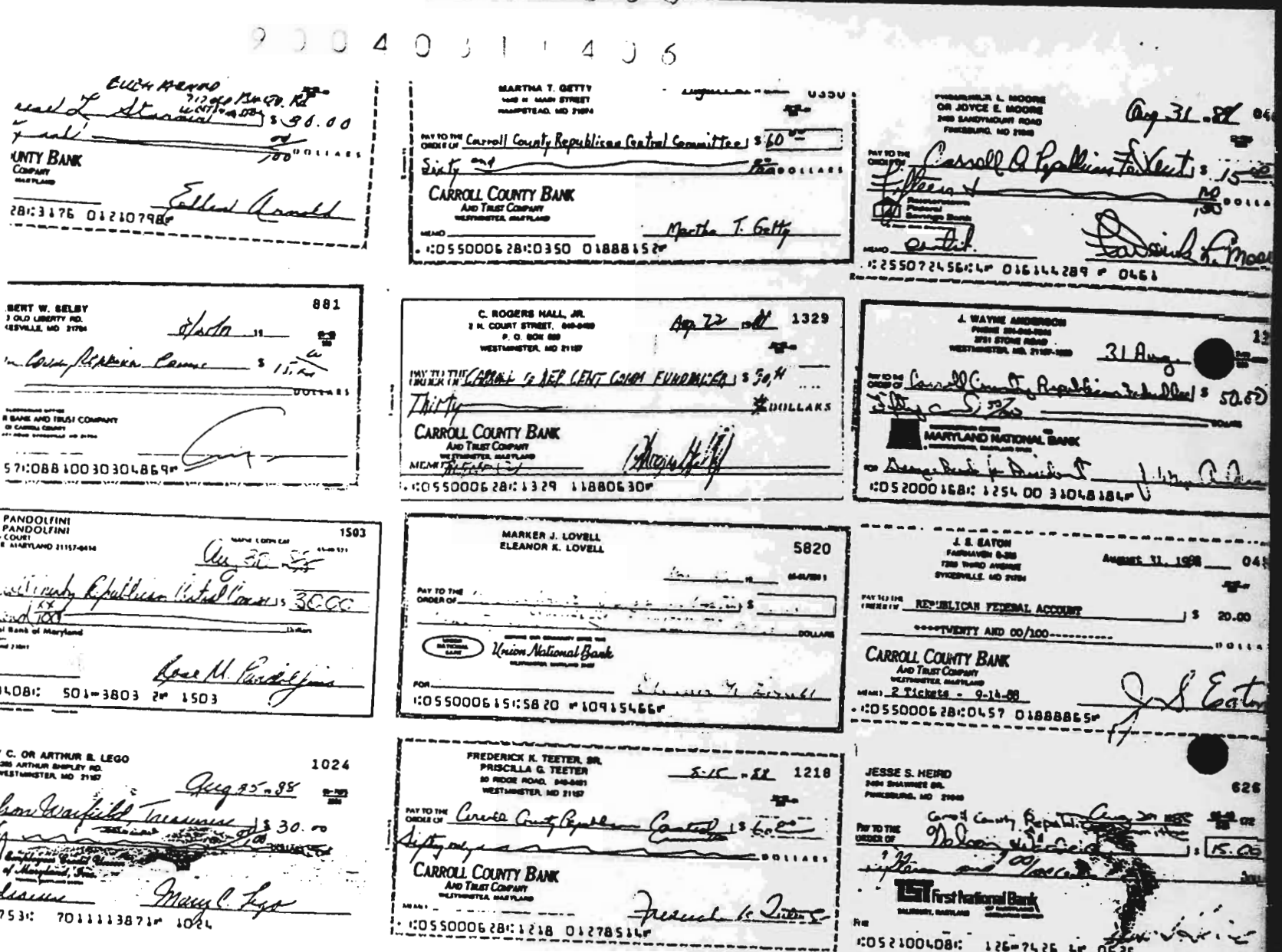
Fifteen and XX/100 DOLLARS

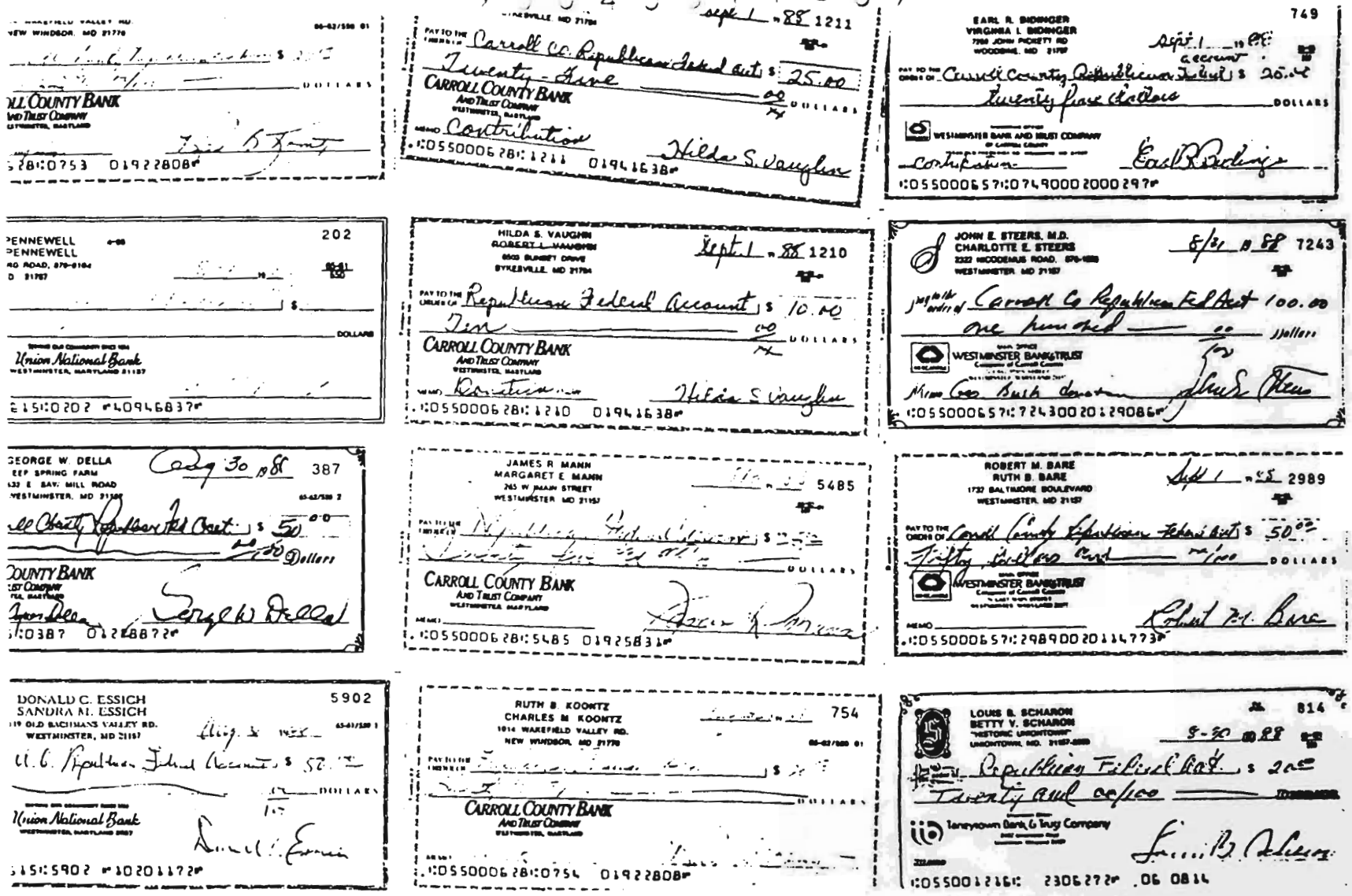
AMERICAN SECURITY BANK, N.A.

9/3

:0540005510:13-366 91 729# 3367

9 0 0 4 0 8 1 1 4 0 5





[illegible] 0 0 4 0 8 1 1 4 0 7

[illegible] VALLEY RD.
NEW WINDSOR, MD 21776

[illegible]

[illegible] DOLLARS

[illegible] COUNTY BANK
AND TRUST COMPANY
[illegible], MARYLAND

[illegible]

:0753 0192280B

[illegible]VILLE, MD 21784

Sept 1 19 88 1211

PAY TO THE ORDER OF Carroll Co. Republican Federal Acct $ 25.00

Twenty-five 00 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO Contribution

Hilda S. Vaughn

:0550006281: 1211 0194163B

EARL R. BIDINGER
VIRGINIA L. BIDINGER
7700 JOHN PICKETT RD
WOODBINE, MD 21797

749

Sept 1 19 88
account

PAY TO THE ORDER OF Carroll County Republican Federal $ 25.00

Twenty five 00/100 DOLLARS

WESTMINSTER BANK AND TRUST COMPANY
OF CARROLL COUNTY

Contribution

Earl R Bidinger

:0550006571:074900020002977

[illegible]ENNEWELL
[illegible]ENNEWELL
[illegible] ROAD, 876-0184
[illegible] 21787

202

[illegible] 19 [illegible]

$ [illegible]

DOLLARS

Union National Bank
WESTMINSTER, MARYLAND 21157

[illegible]:0202 :4094683 7B

HILDA S. VAUGHN
ROBERT L. VAUGHN
6503 SUNSET DRIVE
SYKESVILLE, MD 21784

Sept 1 19 88 1210

PAY TO THE ORDER OF Republican Federal Account $ 10.00

Ten 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO Donation

Hilda S Vaughn

:0550006281: 1210 0194163B

JOHN E. STEERS, M.D.
CHARLOTTE E. STEERS
2322 MCCOMMAS ROAD, 876-1555
WESTMINSTER, MD 21157

8/31 19 88 7243

Pay to the order of Carroll Co Republican Fed Acct 100.00

one hundred 00/100 Dollars

WESTMINSTER BANK&TRUST
Company of Carroll County

For

Memo Geo Bush donation

John E Steers

:0550006571: 724300020290086

GEORGE W. DELLA
DEEP SPRING FARM
[illegible] E. BAY MILL ROAD
WESTMINSTER, MD 21157

Aug 30 19 88 387

[illegible] Charity Republican Fed Acct $ 50.00

Fifty 00/100 Dollars

[illegible] COUNTY BANK
[illegible] TRUST COMPANY
[illegible], MARYLAND

For Dues

George W Della

[illegible]:0387 0122887 2B

JAMES R. MANN
MARGARET E. MANN
265 W. MAIN STREET
WESTMINSTER, MD 21157

[illegible] 19 [illegible] 5485

PAY TO THE ORDER OF [illegible] $ [illegible]

[illegible] DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO [illegible]

James R Mann

:0550006281: 5485 0192583 1B

ROBERT M. BARE
RUTH B. BARE
1732 BALTIMORE BOULEVARD
WESTMINSTER, MD 21157

Sept 1 19 88 2989

PAY TO THE ORDER OF Carroll County Republican Federal Acct $ 50.00

Fifty 00/100 DOLLARS

WESTMINSTER BANK&TRUST
Company of Carroll County

MEMO

Robert M. Bare

:0550006571: 298900201147738

DONALD C. ESSICH
SANDRA M. ESSICH
[illegible] OLD BACHMANS VALLEY RD.
WESTMINSTER, MD 21157

5902

Aug 3 19 88

U.S. Republican Federal Account $ 52.00

[illegible] DOLLARS

Union National Bank
WESTMINSTER, MARYLAND 21157

[illegible]:5902 :0202[illegible]72B

RUTH B. KOONTZ
CHARLES M. KOONTZ
1014 WAKEFIELD VALLEY RD.
NEW WINDSOR, MD 21776

[illegible] 19 [illegible] 754

PAY TO THE ORDER OF [illegible] $ [illegible]

[illegible] DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO [illegible]

:0550006281: 0754 0192280B

LOUIS B. SCHARON
BETTY V. SCHARON
"HISTORIC UNIONTOWN"
UNIONTOWN, MD. 21157-9559

814

8-30 19 88

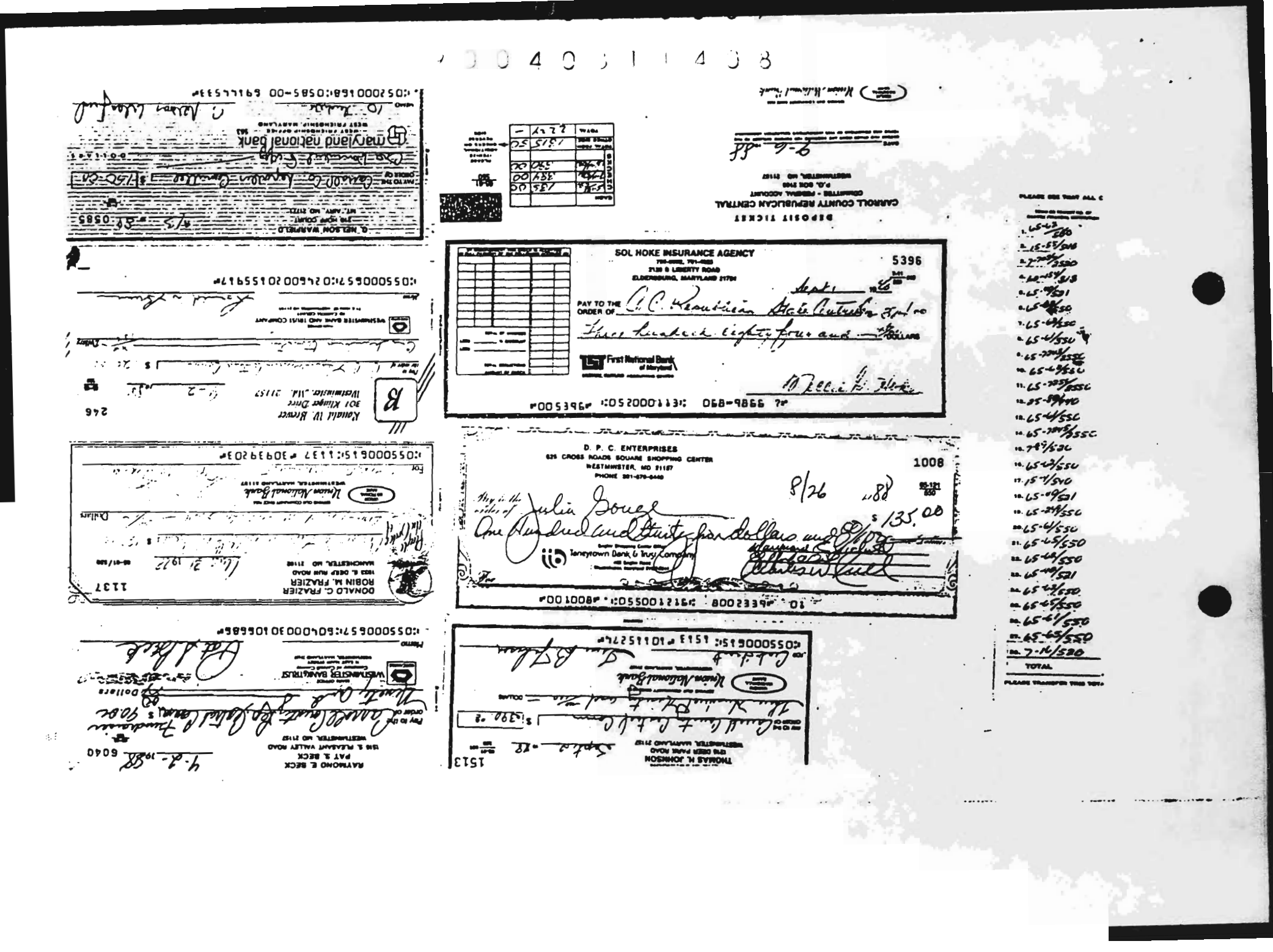
Republican Federal Acct $ 20.00

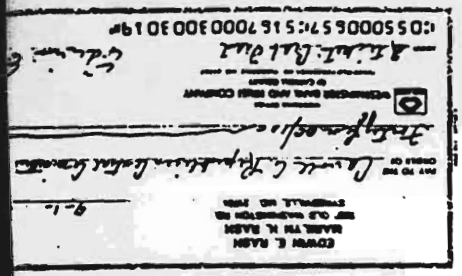
Twenty and 00/100 DOLLARS

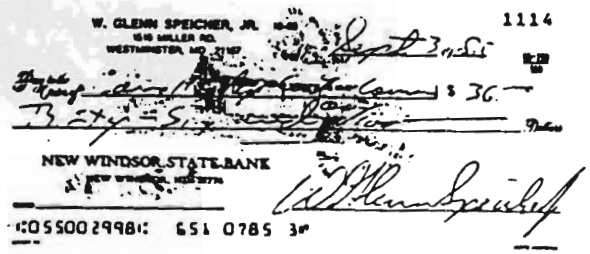
Taneytown Bank & Trust Company

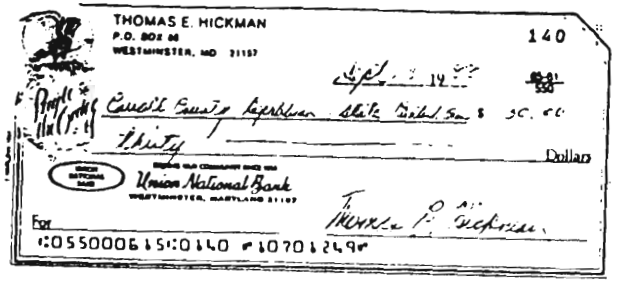
Louis B Scharon

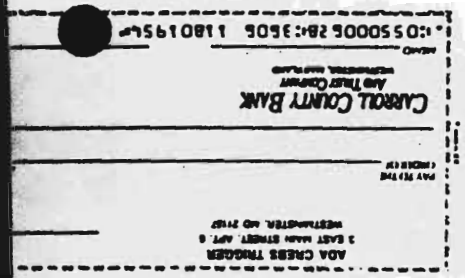
:0550012161: 2306272B .06 0814

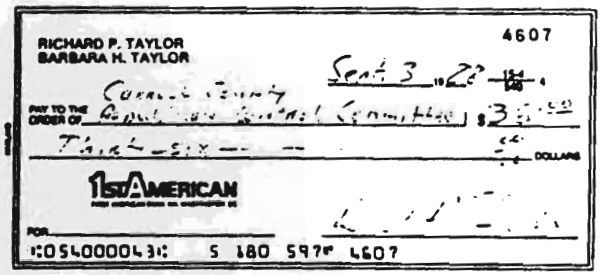


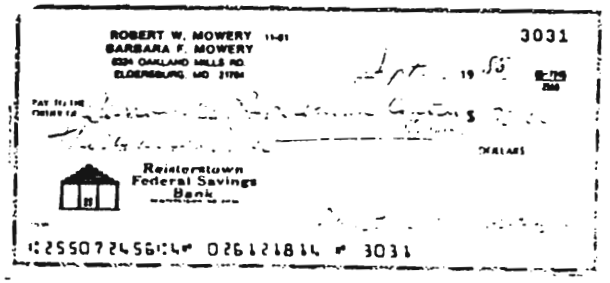


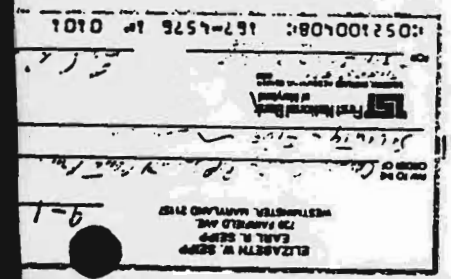

W. GLENN SPEICHER, JR.
1114
NEW WINDSOR STATE BANK

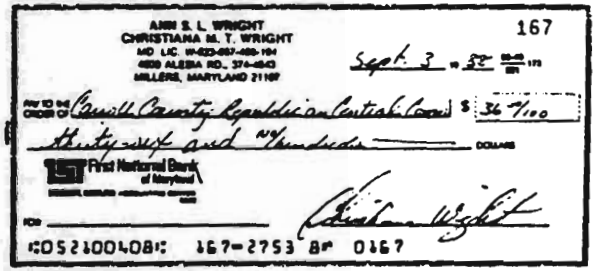

THOMAS E. HICKMAN
140
Union National Bank

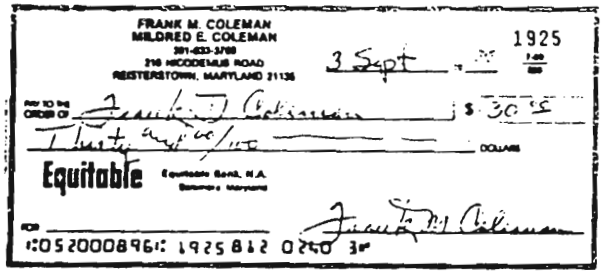


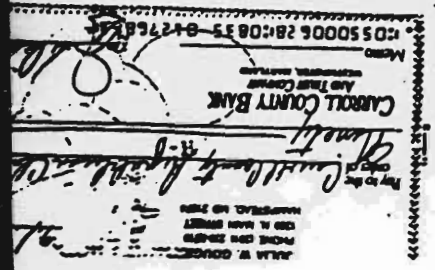

RICHARD P. TAYLOR
BARBARA H. TAYLOR
4607
1st AMERICAN

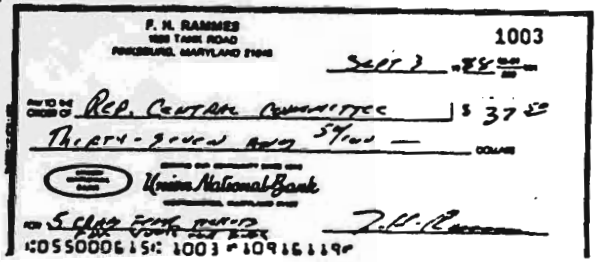

ROBERT W. MOWERY
BARBARA F. MOWERY
3031
Reisterstown Federal Savings Bank

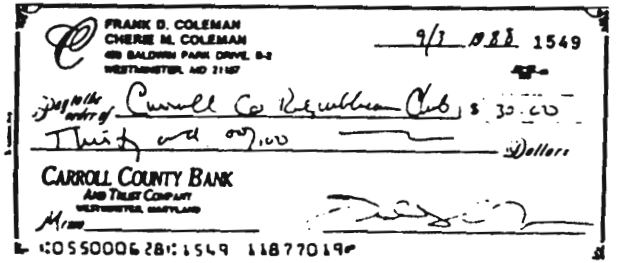



ANN S. L. WRIGHT
CHRISTIANA M. T. WRIGHT
167
First National Bank of Maryland


FRANK M. COLEMAN
MILDRED E. COLEMAN
1925
Equitable




F. H. RAMMES
1003
Union National Bank


FRANK D. COLEMAN
CHERIE M. COLEMAN
1549
CARROLL COUNTY BANK
AND TRUST COMPANY

MARTIN K. P. HILL
[illegible]
MANCHESTER, MD 21102

1246

Sept. 1 19 88

PAY TO THE ORDER OF Republican Federal account $ 50 =

Fifty and 1/a DOLLARS

First National Bank

FOR Roberts unit 6

Martin K.P. Hill

#001246# :052100408: 126-6049 5#

ADA CREBS TRIGGER
3 EAST MAIN STREET, APT. 6
WESTMINSTER, MD 21157

3607

PAY TO THE ORDER OF $

DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

:055000628:3607 118019549

DEPOSIT TICKET
CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2100
WESTMINSTER, MD 21157

DATE 9-6 19 88

BANK	1015	—
CURRENCY		
COIN		
CHECKS		
TOTAL FROM OTHER SIDE	165	—
TOTAL	1180	—

Union National Bank
WESTMINSTER, MARYLAND

#001916# :055000615: #107010629#

DONALD B. ELLIOTT
JEANNE BAKER ELLIOTT
304 LAMBERT AVENUE, BOX 370
NEW WINDSOR, MD 21776

2743

Sept 3 , 88

PAY TO THE ORDER OF George Beal for President $ 50 00

Fifty 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Donald Baker Elliott

:055000628: 2743 012060887#

THOMAS E. HICKMAN
P.O. BOX 98
WESTMINSTER, MD 21157

141

Sept 3 1988

Pay to the Order of Carroll County Central Comm $ 20.00

Twenty Dollar

Union National Bank
WESTMINSTER, MARYLAND

For Bond T Metz

Thomas E. Hickman

:055000615:0141 #107012499#

1.65	50	00
1.65	25	00
1.65	20	00
1.65	50	00
1.65	10	00

PLEASE ADD THESE ALL ITEMS ARE DEPOSITED

TOTAL

PLEASE TRANSFER THIS TOTAL TO OTHER SIDE

LOUISE SHIPLEY FILLION
34 W. GREEN STREET
WESTMINSTER, MD 21157

Aug 31 19 88 1968

PAY TO THE ORDER OF Carroll County Republican Central $ 25.00

Twenty-five dollars as credit payment on account

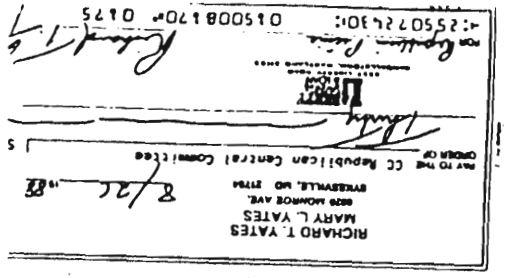
CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Louise Fillion

:055000628:1968 019125004

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0 1 1 4 0 3 0 0 9



RICHARD T. YATES
MARY L. YATES
8820 MONROE AVE.
GRASSMALE, MD 21744

8/22 19 88

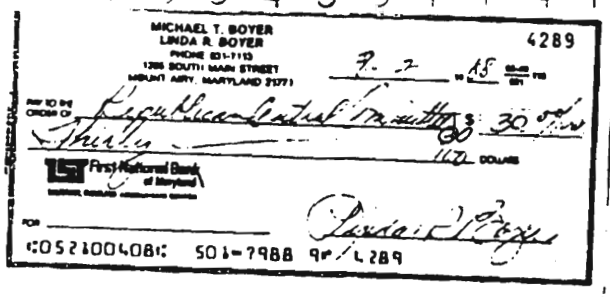
CC Republican Central Committee $ 15.00

DOLLARS

LIBERTY NATIONAL BANK
AND TRUST COMPANY

FOR

:055007228: 0150081708 0175



MICHAEL T. BOYER
LINDA R. BOYER
PHONE 831-7113
1205 SOUTH MAIN STREET
MOUNT AIRY, MARYLAND 21771

4289

7-2 19 88

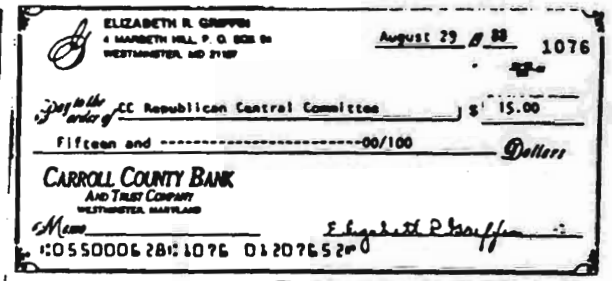
PAY TO THE ORDER OF Republican Central Committee $ 30.00

Thirty and 00/100 DOLLARS

First National Bank of Maryland

FOR

:052100408: 501-7988 9P/L289



ELIZABETH R. GRIFFIN
4 MARBETH HILL, P. O. BOX 84
WESTMINSTER, MD 21157

August 29 88 1076

Pay to the order of CC Republican Central Committee $ 15.00

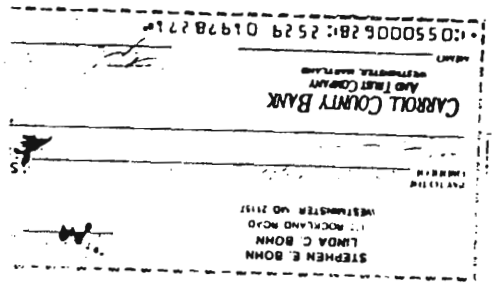
Fifteen and ----------00/100 Dollars

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Memo

Elizabeth R. Griffin

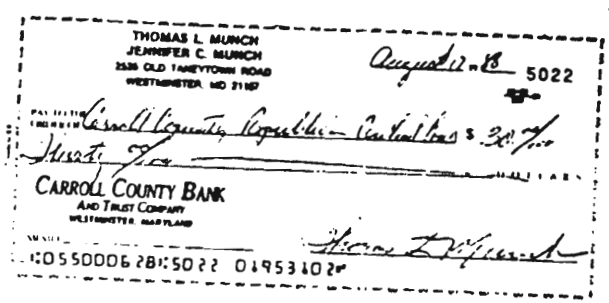
:055000628: 1076 0120765 2P



STEPHEN E. BOHN
LINDA C. BOHN
[illegible] ROCKLAND ROAD
WESTMINSTER, MD 21157

CARROLL COUNTY BANK
AND TRUST COMPANY

:055000628: 2529 0197827 1P



THOMAS L. MUNCH
JENNIFER C. MUNCH
2530 OLD TANEYTOWN ROAD
WESTMINSTER, MD 21157

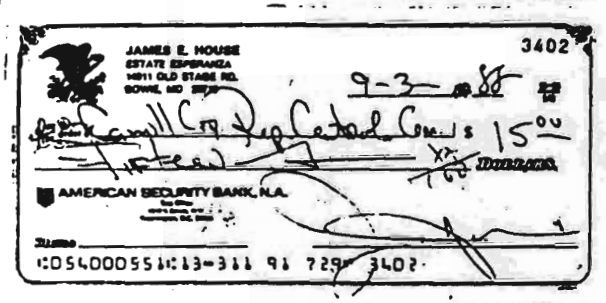
August 22 88 5022

PAY TO THE ORDER OF Carroll County Republican Central Com $ 30.00

Thirty and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

:055000628: 5022 0195310 2P



JAMES E. HOUSE
ESTATE ESPERANZA
14011 OLD STAGE RD.
BOWIE, MD 20715

3402

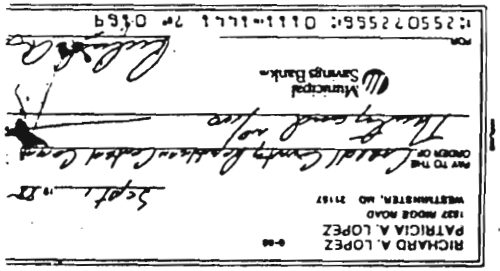
9-3 88

Pay to the order of Carroll Cty Rep Central Com $ 15.00

Fifteen and 00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.

:054000551: 13-311 91 729: 3402



RICHARD A. LOPEZ
PATRICIA A. LOPEZ
1527 MOORE ROAD
WESTMINSTER, MD 21157

Sept 19 88

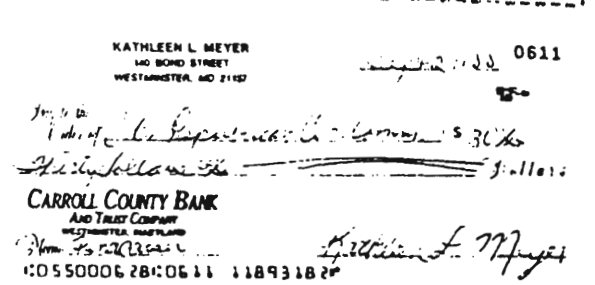
Pay to the order of Carroll County Republican Central Committee $ 30.00

Thirty and no/100 DOLLARS

Westminster Savings Bank

FOR

:255072556: 0111-1111 7P 0169



KATHLEEN L. MEYER
140 BOND STREET
WESTMINSTER, MD 21157

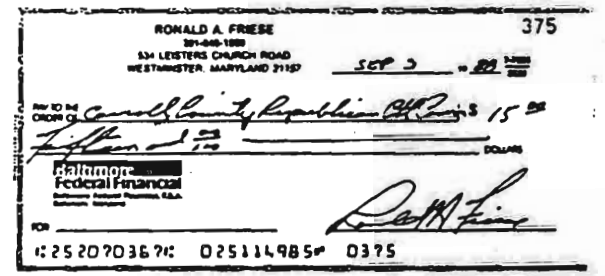
0611

Pay to the order of Carroll County Republican Committee $ 30.00

Thirty Dollars and 00/100 Dollars

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

:055000628: 0611 1189318 2P



RONALD A. FRIESE
301-848-1888
534 LEISTERS CHURCH ROAD
WESTMINSTER, MARYLAND 21157

375

SEP 3 88

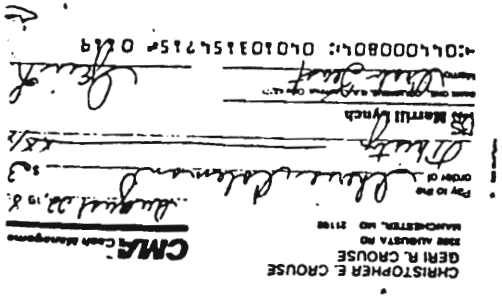
PAY TO THE ORDER OF Carroll County Republican Cent $ 15.00

Fifteen and 00/100 DOLLARS

Baltimore Federal Financial

FOR

:252070367: 025114985 0375



CHRISTOPHER E. CROUSE
GERI R. CROUSE
3302 AUGUSTA RD
MANCHESTER, MD 21102

CMA Cash Management Account

Sept 22 19 88

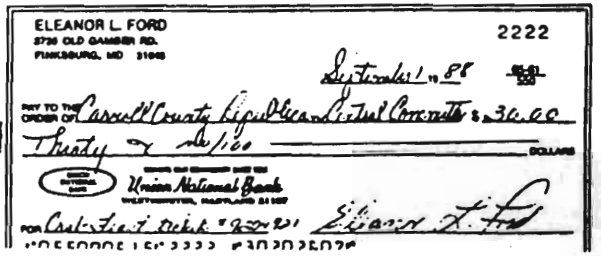
PAY TO THE ORDER OF Carroll County Republican Committee $ 30.00

Thirty and no/100 DOLLARS

Maryland Lyrics

FOR

:011000080: 010103154 715 0169



ELEANOR L. FORD
3720 OLD GAMBER RD.
FINKSBURG, MD 21048

2222

September 1 88

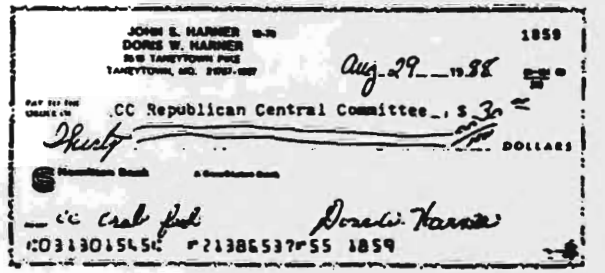
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 30.00

Thirty and no/100 DOLLARS

Union National Bank
WESTMINSTER, MARYLAND 21157

FOR Carl-Fred Ford "Fred" Eleanor L. Ford

:055000151: 2222 P30202502P



JOHN E. HARNER
DORIS W. HARNER
2510 TANEYTOWN PIKE
TANEYTOWN, MD. 21787-1507

1859

Aug 29 19 88

PAY TO THE ORDER OF CC Republican Central Committee $ 30.00

Thirty and no/100 DOLLARS

FOR CC Carl Fred Donald Harner

:031301545: P21386537P55 1859

DEPOSIT TICKET

CARROLL COUNTY REPUBLICAN CENTRAL COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 3100
WESTMINSTER, MD 21157

NOODLE-DOOSEY PRESS
JOSEPH M. GETTY
P.O. BOX 715
MANCHESTER, MD 21180

1806

First National Bank

153

ROBIN RAYE BOSLEY
2201 OLD WESTMINSTER PIKE
FINKSBURG, MD 21048

August 27 88

Union National Bank

HARRY W. HAIGHT P.A.
T/A HAIGHT FUNERAL HOME
P.O. Box 195 Sykesville, MD 21784

5160

PAY TO THE ORDER OF Carroll County Republican

Thirty DOLLARS

ROBERT M. WHEELER
ATTORNEY AT LAW
CHURCHILL FARMS, 1438 DEER PARK ROAD
FINKSBURG, MD 21048

7310

Aug 20 88

PAY TO THE ORDER OF Carroll County Republican Committee $ 30.00

Thirty DOLLARS

maryland national bank
BALTIMORE, MARYLAND

FOR Crab Feast

FRANCIS X. WALSH, JR.
ATTORNEY AT LAW
8 NORTH COURT STREET
WESTMINSTER, MD 21157

0732

August 26 19 88

PAY TO THE ORDER OF Reese L Stonesifer $ 30.00

Thirty and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

FOR

MARK S. SNYDER
28 BOND STREET
WESTMINSTER, MD 21157

3029

Aug 30 88

PAY TO THE ORDER OF Carroll Co Republican Cent. Comm $ 150

One Hundred Fifty Dollars DOLLARS

Union National Bank



BELLE S. FRINGER
80 1/2 W. GREEN STREET
WESTMINSTER, MD 21157

3 Oct 88

Pay to the order of Gary Bauer, Treas. $ 50.00

Twenty-two dollars and 50/100

Union National Bank
WESTMINSTER, MARYLAND

Belle S. Fringer

:055015:2336 #1090238 2#

EDWIN E. RASH
MARILYN H. RASH
5127 OLD WASHINGTON RD.
SYKESVILLE, MD. 21784

5195

10-5 1988

PAY TO THE ORDER OF Gary Bauer, Treas. $ 15.00

Fifteen and 00/100 DOLLARS

WESTMINSTER BANK AND TRUST COMPANY
OF CARROLL COUNTY

2 Tickets (Banquet/Hard) Edwin E. Rash

:055000657:5195000300301 9#

LOUIS B. SCHARON
BETTY V. SCHARON
"HISTORIC UNIONTOWN"
UNIONTOWN, MD. 21157-3000

857

10-4 88

Pay to the order of Gary Bauer $ 15.00

Fifteen and 00/100 DOLLARS

Taneytown Bank & Trust Company

Cash Breakfast Louis B. Scharon

:055001216: 2306272# 06 0857

STANLEY M. BELL JR.
MARGARET B. BELL
1604 LITTLESTOWN PIKE
WESTMINSTER, MARYLAND 21157

10/4 88

Pay to the order of Gary Bauer, Treasurer $ 50.00

Fifty and 00/100

MARYLAND NATIONAL BANK

Margaret

:052000168: 4769 00 252488 24#

RONALD E. ZEPP
SUSAN E. ZEPP
205 WILLOW AVENUE
WESTMINSTER, MD 21157

Oct 4 1988 0866

Pay to the order of Gary Bauer $ 15.00

Fifteen and 00/100 Dollars

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Memo Ronald E. Zepp

:055000628:0866 018853 57#

PHILIP E. WAMPLER
MARGARET H. WAMPLER
39 MILTON AVENUE
WESTMINSTER, MD 21157

Oct 4 1988 6611

PAY TO THE ORDER OF [illegible] $ [illegible]

DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO [illegible]

:055000628:6611 012189 92#

THOMAS PAUL ROBERTSON, SR. OR
LOUISE ROBERTSON
6809 SHARRETT ROAD
NEWARK, MD 21757-9169

Oct 4 88

Pay to the order of Gary Bauer, Treasurer $ 50.00

Fifty and 00/100

Taneytown Bank & Trust Company

Memo "Breakfast for Bush" Louise A. Robertson

:055001216: 7101215# 06 0102

GERALD R. SOMMER
SALLY J. SOMMER
5139 BARTHOLOW RD. 795-4779
BLOOMSBURG, MD 21914

545

9-30 1988

PAY TO THE ORDER OF Federal Account $ 50.00

Fifty DOLLARS

Reisterstown Federal Savings Bank

ST-Shirts Sally Sommer

:255072456:4# 026163352 # 054

JOANITA M. BRIGHTBILL
DEAN A. BRIGHTBILL
1723 INDIAN COURT
HAMPSTEAD, MD 21074

1394

Oct 4 1988

PAY TO THE ORDER OF Gary Bauer, Treasurer $ 15.00

Fifteen and 00/100 DOLLARS

AMEC

FOR Joanita M. Brightbill

:055003023:39410 21150663# 84

GUY L. HARRIMAN
SANDRA R. HARRIMAN
PH. 301-776-3239
7717 TWIN OAKS WAY
LAUREL, MARYLAND 20707

10/1

Pay to the order of Republican Fed. Account $ 10.00

Ten Dollars and no/100

Equitable Bankers Bank, N.A.
Columbia, Maryland

2 Bush Hats Guy L. Harriman

:055003 1E [illegible]

RONALD E. ZEPP
SUSAN E. ZEPP
205 WILLOW AVENUE
WESTMINSTER, MD 21157

Oct 88 1037

Pay to the order of Republican Central Committee of Carroll Co $ 6.00

Six and 00/100 Dollars

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Memo for Cap

:055000628:1037 [illegible]

S. STEVEN PENNEWELL
KATHLEEN PENNEWELL
6948 MIDDLEBURG ROAD, 876-6184
TANEYTOWN, MD 21787

283

19 88

PAY TO THE ORDER OF [illegible] $ 15.00

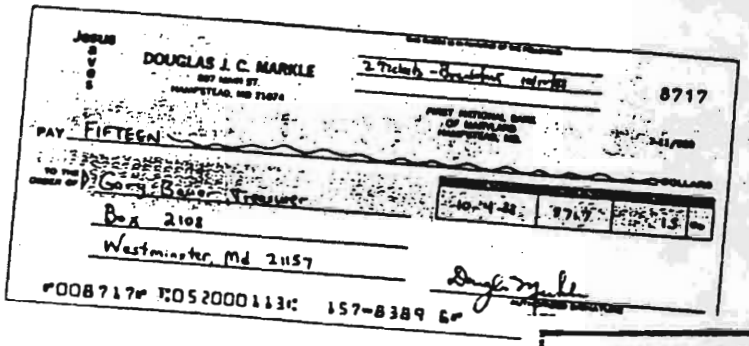
DOLLARS

Union National Bank
WESTMINSTER, MARYLAND 21157

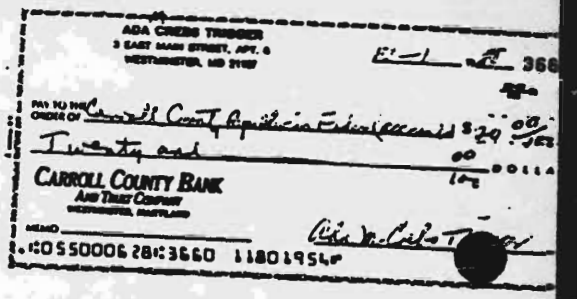
FOR [illegible]

:055000615:0283 #0946837#

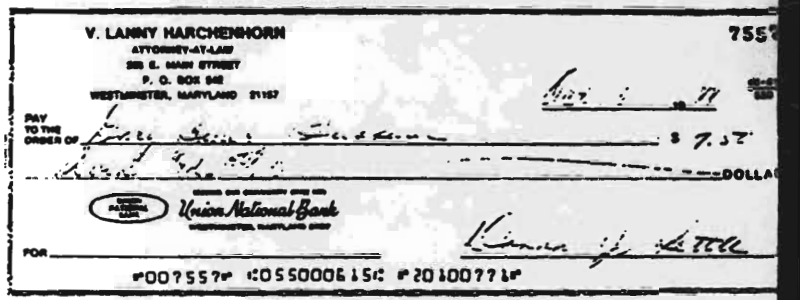
9 0 0 4 0 8 1 1 4 1 4



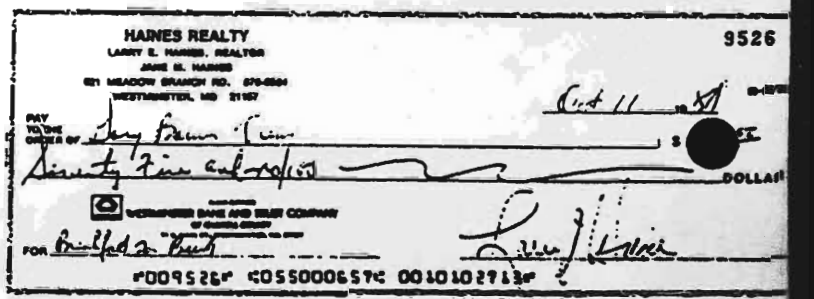
DOUGLAS J. C. MARKLE
8717
PAY FIFTEEN
Gary L. Baker, Treasurer
Box 2108
Westminster, Md 21157
Douglas Markle
⑈008717⑈ ⑆052000113⑆ 157-8389 6⑈



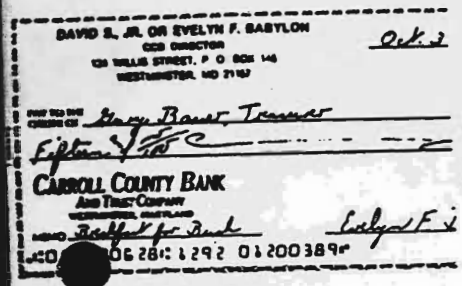
AGA CREBS TRIGGER
3 EAST MAIN STREET, APT. 6
WESTMINSTER, MD 21157
PAY TO THE ORDER OF Carroll County Republican Headquarters $20.00
Twenty and 00/100 DOLLARS
CARROLL COUNTY BANK AND TRUST COMPANY
WESTMINSTER, MARYLAND
MEMO
⑆055000628⑆3660 11801954⑈



V. LANNY HARCHENHORN
ATTORNEY-AT-LAW
225 E. MAIN STREET
P. O. BOX 848
WESTMINSTER, MARYLAND 21157
PAY TO THE ORDER OF $ 7.57
DOLLARS
Union National Bank
FOR
⑈007557⑈ ⑆055000615⑆ ⑈20100771⑈



HAINES REALTY
LARRY E. HAINES, REALTOR
JANE E. HAINES
621 MEADOW BRANCH RD. 876-6564
WESTMINSTER, MD 21157
9526
PAY TO THE ORDER OF Gary Baker Treas
Sixty Five and 00/100 $ 65.00
DOLLARS
WESTMINSTER BANK AND TRUST COMPANY
FOR Bullfrog Fund
⑈009526⑈ ⑆055000657⑆ 00101029⑈



DAVID S., JR. OR EVELYN F. BABYLON
CCD DIRECTOR
128 WILLIS STREET, P. O. BOX 146
WESTMINSTER, MD 21157

Oct 2

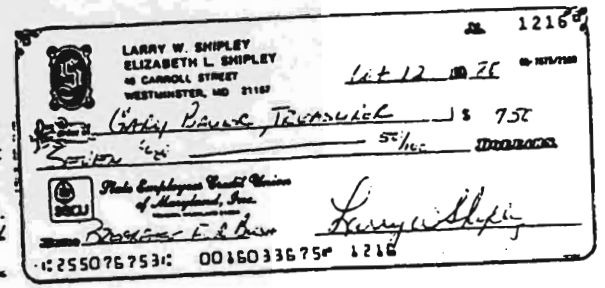
Pay to the order of Mary Bauer, Treasur
Fifteen 00/100

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Memo Budget for Book

Evelyn F. B

:0[redacted]6 28: 1292 01200389



LARRY W. SHIPLEY
ELIZABETH L. SHIPLEY
48 CARROLL STREET
WESTMINSTER, MD 21157

1216

Oct 12 19 96

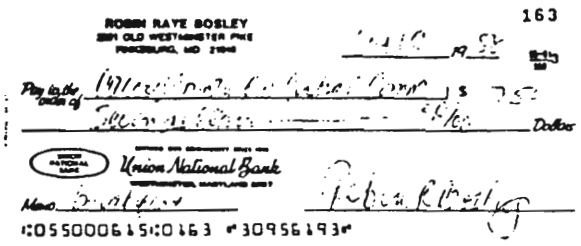
Pay to the order of Mary Bauer, Treasurer $ 7.50
Seven 50/100 Dollars

Police Employees Credit Union of Maryland, Inc.

Memo Bookcover E.E. Bear

Larry W. Shipley

:0255076753: 00160336 75 1216



ROBIN RAYE BOSLEY
2201 OLD WESTMINSTER PIKE
FINKSBURG, MD 21048

163

Oct 12 96

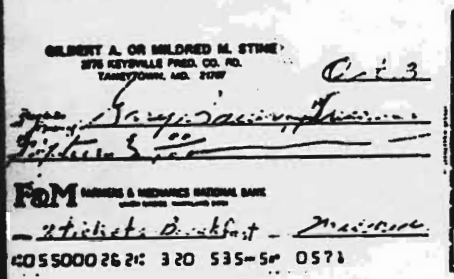
Pay to the order of Mary Bauer, Treasurer $ 7.50
Seven 50/100 Dollars

Union National Bank
WESTMINSTER, MARYLAND

Memo Bookcover

Robin R Bosley

:0550006 15:0163 #309561 93



GILBERT A. OR MILDRED M. STINE
3775 KEYSVILLE PRES. CO. RD.
TANEYTOWN, MD. 21787

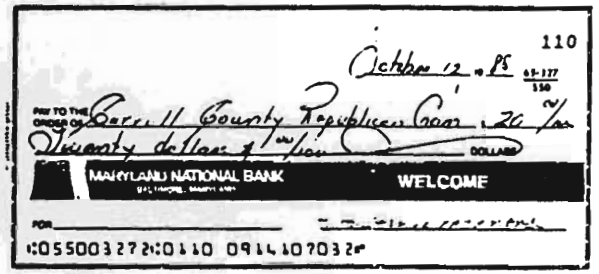
Oct 3

Pay to the order of Mary Bauer, Treasurer
Fifteen 00/100

F&M FARMERS & MECHANICS NATIONAL BANK

Tickets Buckeye Mailroom

:0550006 26: 320 535-5 0571



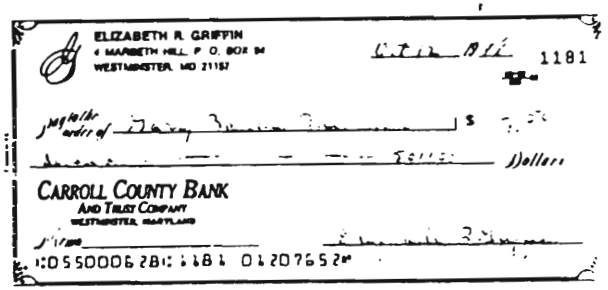
October 12 96 65-177/550 110

Pay to the order of Carroll County Republican Com $ 20.00
Twenty dollars 00/100 DOLLARS

MARYLAND NATIONAL BANK WELCOME

FOR

:0550032 72:0110 0914 07032



ELIZABETH R. GRIFFIN
4 MARBETH HILL P. O. BOX 84
WESTMINSTER, MD 21157

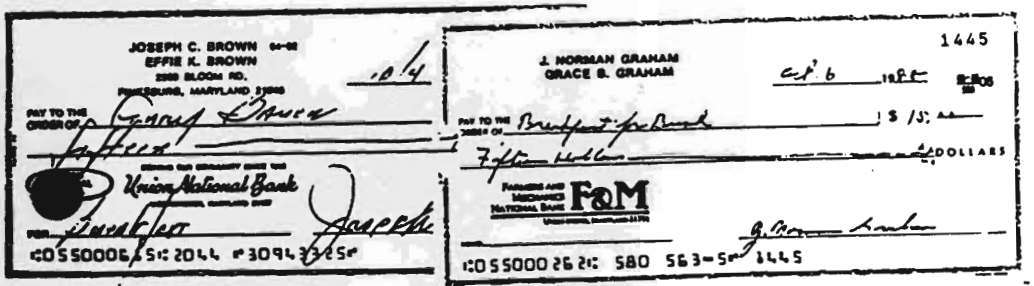
Oct 12 96 1181

Pay to the order of Mary Bauer, Treasurer $ 7.50
Seven 50/100 Dollars

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

For Ticket 3 Stamps

:0550006 28: 1181 01207652



JOSEPH C. BROWN
EFFIE K. BROWN
2000 BLOOM RD.
FINKSBURG, MARYLAND 21048

10/4

Pay to the order of Mary Bauer Treasurer
Fifteen 00/100

Union National Bank
WESTMINSTER, MARYLAND

For Ticket Fee Joseph

:0550006 25: 2044 #309 3 25

J. NORMAN GRAHAM
GRACE B. GRAHAM

1445

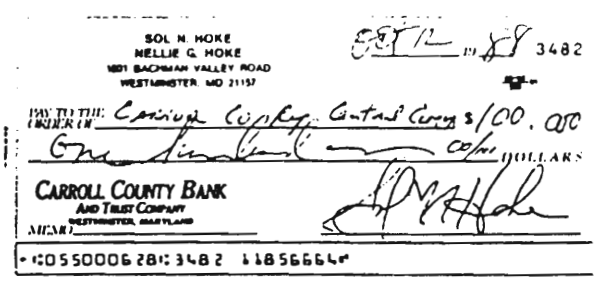
Oct 6 1996

Pay to the order of Budget Tips Book $ 15.00
Fifteen and no/100 DOLLARS

Farmers and Mechanics National Bank F&M

G. Norman Graham

:0550003 26 21: 580 563-5 1445



SOL N. HOKE
NELLIE G. HOKE
1801 BACHMAN VALLEY ROAD
WESTMINSTER, MD 21157

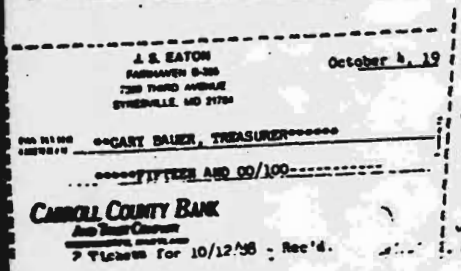
Oct 12 19 96 3482

PAY TO THE ORDER OF Carroll County Cultural Comm $100.00
One hundred 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO

:0550006 28: 3482 1185666 4



J. S. EATON
FAIRHAVEN 0-355
7300 THIRD AVENUE
SYKESVILLE, MD 21784

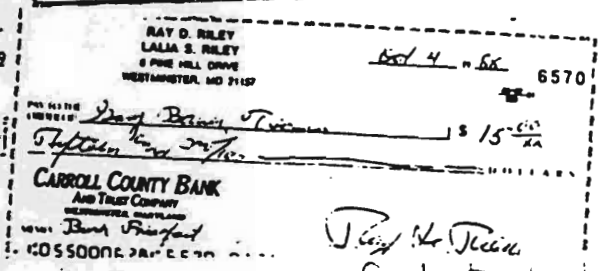
October 6, 19

PAY TO THE ORDER OF GARY BAUER, TREASURER

FIFTEEN AND 00/100

CARROLL COUNTY BANK
AND TRUST COMPANY

7 Tickets for 10/12/96 - Rec'd.



RAY D. RILEY
LALIA S. RILEY
8 PINE HILL DRIVE
WESTMINSTER, MD 21157

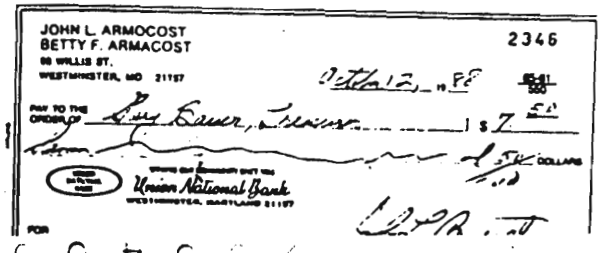
Oct 4 96 6570

PAY TO THE ORDER OF Mary Bauer, Treasurer $ 15.00
Fifteen and no/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

Memo Book Printing

:0550006 28: [illegible]



JOHN L. ARMACOST
BETTY F. ARMACOST
98 WILLIS ST.
WESTMINSTER, MD 21157

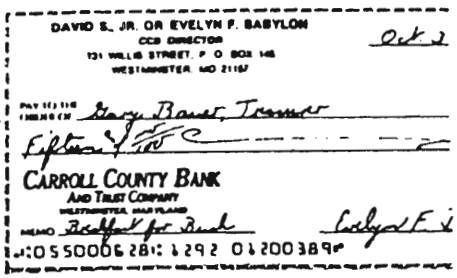
2346

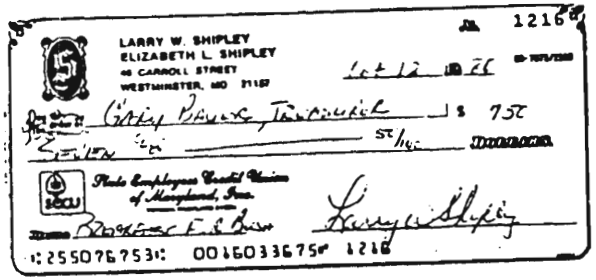
Oct 12, 96

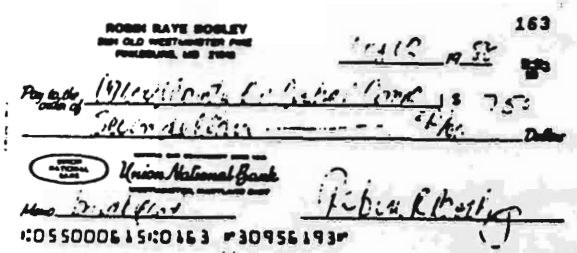
PAY TO THE ORDER OF Gary Bauer, Treasurer $ 7.50
Seven 50/100 DOLLARS

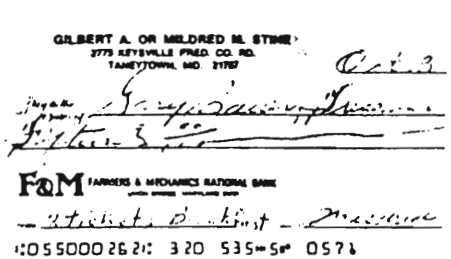
Union National Bank
WESTMINSTER, MARYLAND

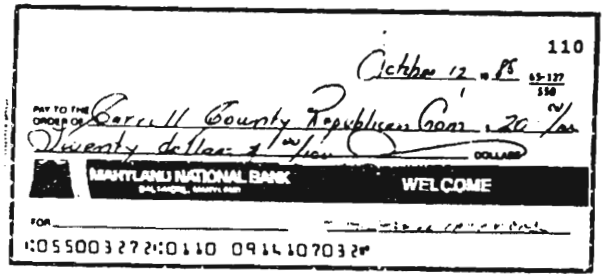
FOR

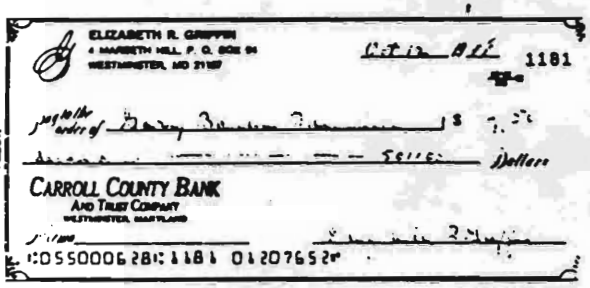

DAVID S., JR. OR EVELYN F. BABYLON
CCB DIRECTOR
131 WILLIS STREET, P. O. BOX 148
WESTMINSTER, MD 21157
Oct 2
Pay to the order of Gary Bauer, Treasurer
Fifteen 00/100
CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND
Memo Breakfast for Bunk
Edyth E. B.
:055000628: 1292 01200389

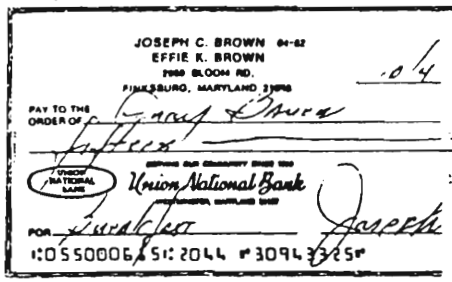

LARRY W. SHIPLEY
ELIZABETH L. SHIPLEY
46 CARROLL STREET
WESTMINSTER, MD 21157
1216
Oct 12 19 98
Pay to the order of Gary Bauer, Treasurer $ 7.50
Seven 50/100
Dollars
Public Employees Credit Union of Maryland, Inc.
Memo Breakfast for Bunk
Larry W. Shipley
:255076753: 0016033675 1216

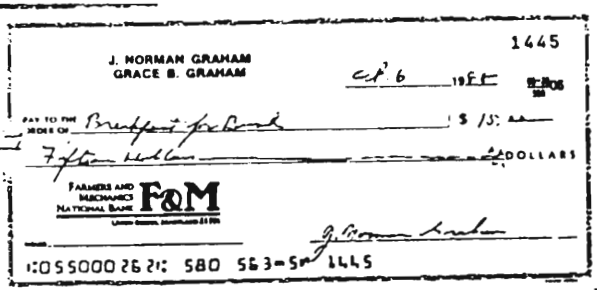

ROBIN RAYE BOSLEY
2504 OLD WESTMINSTER PIKE
FINKSBURG, MD 21048
163
Oct 12 98
Pay to the order of Maryland's Children's Trust $ 7.50
Seven and 50/100 Dollars
Union National Bank
Westminster, Maryland
Memo Breakfast
Robin R. Bosley
:055000615:0163 309561937

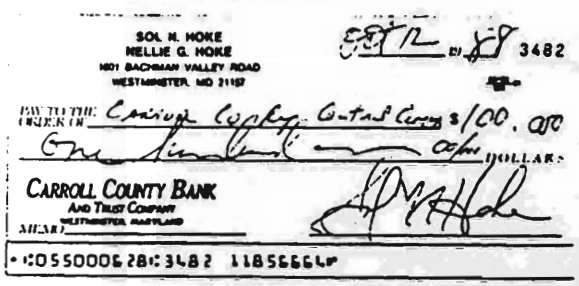

GILBERT A. OR MILDRED M. STINE
2775 KEYSVILLE FRED. CO. RD.
TANEYTOWN, MD. 21787
Oct 3
Pay to the order of Carroll County Republican Committee
Fifteen 00/100
F&M FARMERS & MECHANICS NATIONAL BANK
District 5 Dinner Donation
:055000262: 320 535 5 0571

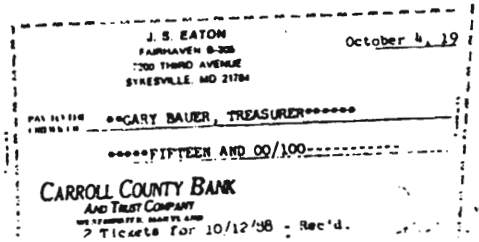

110
October 12 98
65-137
550
PAY TO THE ORDER OF Carroll County Republican Committee $ 20.00
Twenty dollars and 00/100 DOLLARS
MARYLAND NATIONAL BANK
WELCOME
FOR
:055003272:0110 09141070328

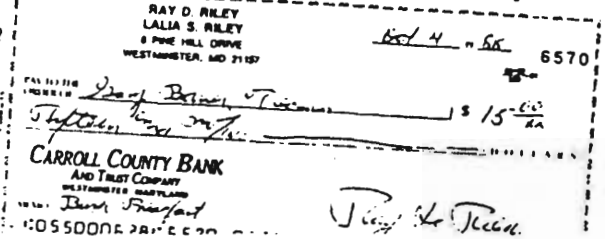

ELIZABETH R. GRIFFEN
4 MAREETH HILL, P. O. BOX 84
WESTMINSTER, MD 21157
Oct 12 98
1181
Pay to the order of Carroll County Republican Committee $ 7.50
Seven 50/100 Dollars
CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND
For Breakfast
:055000628: 1181 01207652

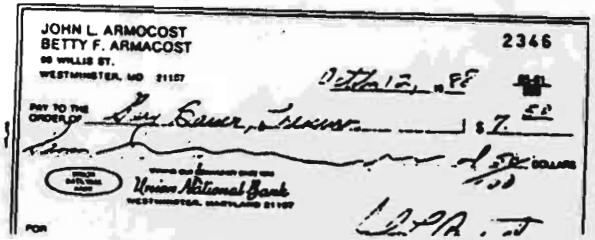

JOSEPH C. BROWN 04-62
EFFIE K. BROWN
7000 BLOOM RD.
FINKSBURG, MARYLAND 21048
Oct 4
Pay to the order of Gary Bauer
Fifteen
Union National Bank
Westminster, Maryland
For Breakfast
Joseph C. Brown
:055000651: 2044 309423125


J. NORMAN GRAHAM
GRACE B. GRAHAM
1445
Oct 6 19 98
Pay to the order of Breakfast for Bunk $ 15.00
Fifteen and 00/100 DOLLARS
FARMERS AND MECHANICS NATIONAL BANK F&M
G. Norman Graham
:055000262: 580 563 5 1445

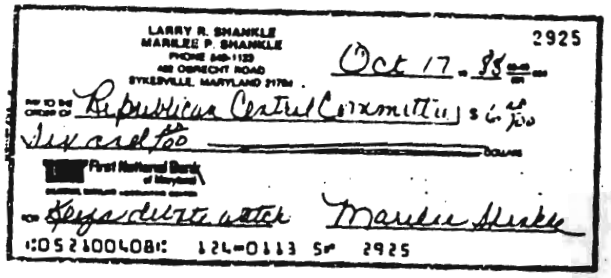

SOL N. HOKE
NELLIE G. HOKE
1601 BACHMAN VALLEY ROAD
WESTMINSTER, MD 21157
Oct 12 98
3482
Pay to the order of Carroll County Co-Ed Camp $ 100.00
One hundred and 00/100 DOLLARS
CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND
Memo
:055000628: 3482 118566644


J. S. EATON
FAIRHAVEN B-205
7200 THIRD AVENUE
SYKESVILLE, MD 21784
October 4, 19
Pay to the order of GARY BAUER, TREASURER
FIFTEEN AND 00/100
CARROLL COUNTY BANK
AND TRUST COMPANY
2 Tickets for 10/12/98 ; Rec'd.


RAY D. RILEY
LALIA S. RILEY
8 PINE HILL DRIVE
WESTMINSTER, MD 21157
Oct 4 98
6570
Pay to the order of Gary Bauer, Treasurer $ 15.00
Fifteen and 00/100 DOLLARS
CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND
To: Bunk Breakfast
:055000628:


JOHN L. ARMACOST
BETTY F. ARMACOST
99 WILLIS ST.
WESTMINSTER, MD 21157
2346
October 12, 98
Pay to the order of Gary Bauer, Treasurer $ 7.50
Seven and 50/100 DOLLARS
Union National Bank
Westminster, Maryland
For Breakfast

0 0 0 4 0 3 1 1 4 1 7


LARRY R. SHANKLE
MARILEE P. SHANKLE
PHONE 848-1133
488 OSPRECHT ROAD
SYKESVILLE, MARYLAND 21784

2925

Oct 17 - 88

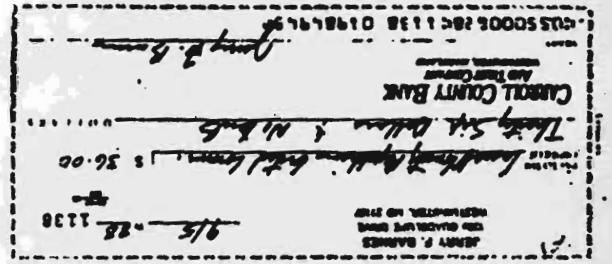
PAY TO THE ORDER OF Republican Central Committee $ 6.00

Six and 00 DOLLARS

First National Bank of Maryland

FOR Reparations water Marilee Shankle

:052000408: 124-0113 5# 2925


CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

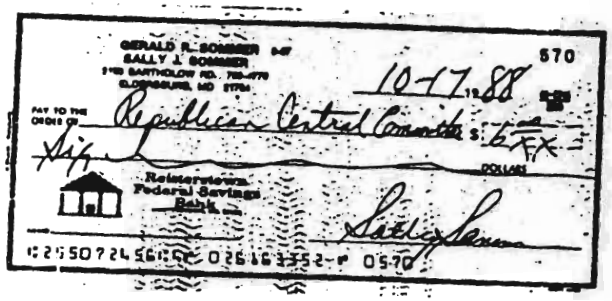
1138

3/6 - 88

PAY TO THE ORDER OF Republican Central Committee $ 25.00

Twenty five dollars & No cts DOLLARS

:055000628: 1138 01981915#


GERALD R. SOMMER
SALLY J. SOMMER
2100 BARTHOLOW RD. 795-4779
GLYNDON, MD 21071

570

10-17 19 88

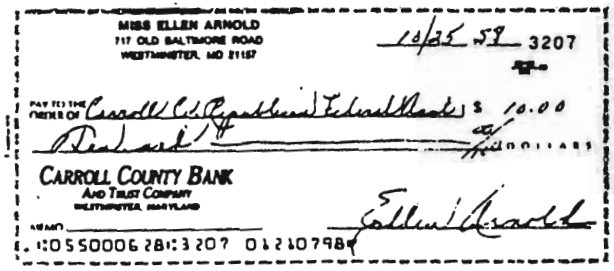
PAY TO THE ORDER OF Republican Central Committee $ 6.00

Six DOLLARS

Reisterstown Federal Savings Bank

Sally J. Sommer

:052507245: 0261633352# 0570


MISS ELLEN ARNOLD
717 OLD BALTIMORE ROAD
WESTMINSTER, MD 21157

10/25 19 88 3207

PAY TO THE ORDER OF Carroll Co Republican Federal Women $ 10.00

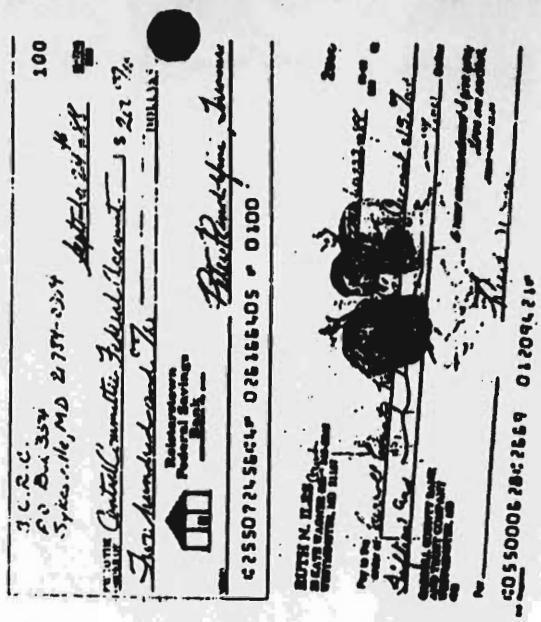
Ten and 00/100 DOLLARS

CARROLL COUNTY BANK
AND TRUST COMPANY
WESTMINSTER, MARYLAND

MEMO

Ellen Arnold

:055000628: 3207 012107984



J.C.R.C.
P.O. Box 339
Sykesville, MD 21784-0339

Sept 6 19 88

Carroll County Central Committee

$ 25.00

Twenty-five and 00/100 DOLLARS

Baltimore Federal Savings Bank

For Membership Account

Ruth N. Ellis
Beats Range Co.
Westminster, Md. 21157

Sept 6 19 88

Carroll County Central Committee

$ 25.00

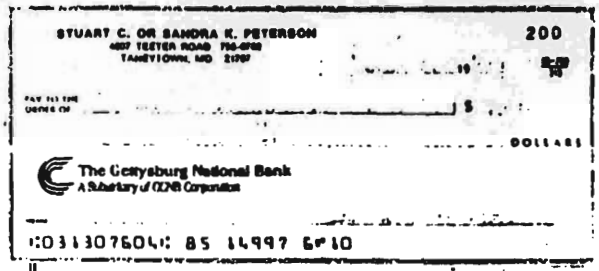
Twenty-five and 00/100 DOLLARS

Baltimore Federal Savings Bank

For Membership Account

Ruth N. Ellis
Beats Range Co.
Westminster, Md. 21157

:055000628:2869 01209421#



STUART C. OR SANDRA K. PETERSON
4007 TESTER ROAD
TANEYTOWN, MD 21787

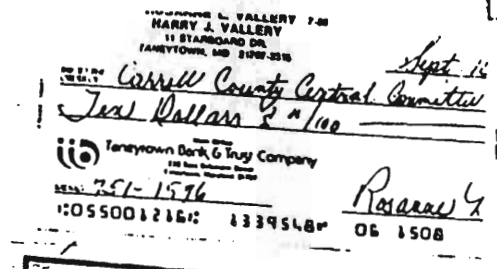
200

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

The Gettysburg National Bank
A Subsidiary of GENB Corporation

:031307604: 85 14997 6# 10



HARRY J. VALLERY
11 STARBOARD DR.
TANEYTOWN, MD 21787-2316

Sept 12

PAY TO THE ORDER OF Carroll County Central Committee

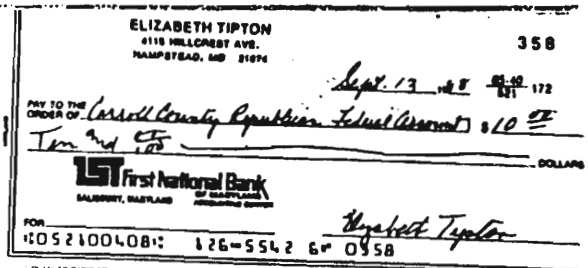
Two Hundred Fifty and 00/100 DOLLARS

Taneytown Bank & Trust Company

MEMO 751-1596

Rosaann V

:055001216: 3339548# 06 1508



ELIZABETH TIPTON
4115 HILLCREST AVE.
HAMPSTEAD, MD 21074

358

Sept. 13 19 88 61-40/511 172

PAY TO THE ORDER OF Carroll County Republican Federal Account $ 10.00

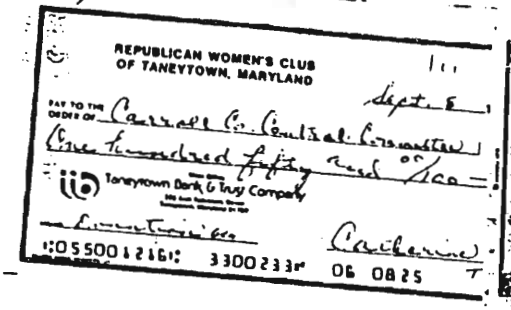
Ten and 00/100 DOLLARS

First National Bank of Maryland
SALISBURY, MARYLAND

FOR

Elizabeth Tipton

:052100408: 126-5542 6# 0358



REPUBLICAN WOMEN'S CLUB
OF TANEYTOWN, MARYLAND

111

Sept. 6 19

PAY TO THE ORDER OF Carroll Co. Central Committee

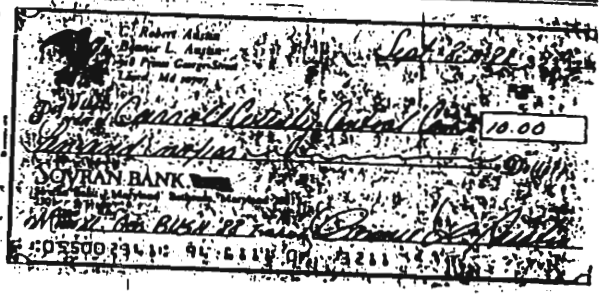
One hundred fifty and 00/100

Taneytown Bank & Trust Company

Contribution

Catherine

:055001216: 3300233# 06 0825



Robert Alston
Eleanor L. Alston
Taneytown, Md. 21787

Sept 6 19 88

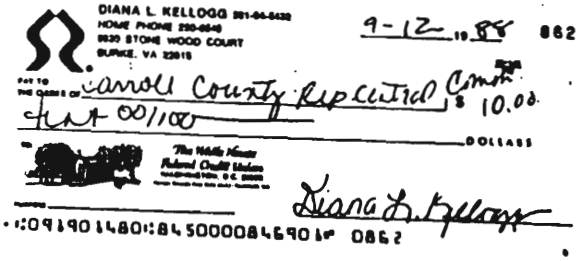
Pay to the order of Carroll County Central Committee $ 10.00

Ten and 00/100 DOLLARS

SOVRAN BANK

For Membership

:055001234: 94 6811 0# 3211



DIANA L. KELLOGG
HOME PHONE
9820 STONE WOOD COURT
BURKE, VA 22015

9-12 19 88 862

PAY TO THE ORDER OF Carroll County Rep Central Comm $ 10.00

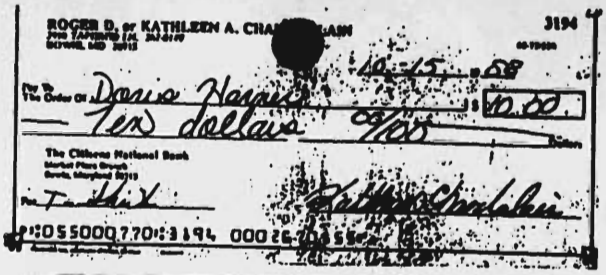
TEN 00/100 DOLLARS

The White House Federal Credit Union
Washington, D.C.

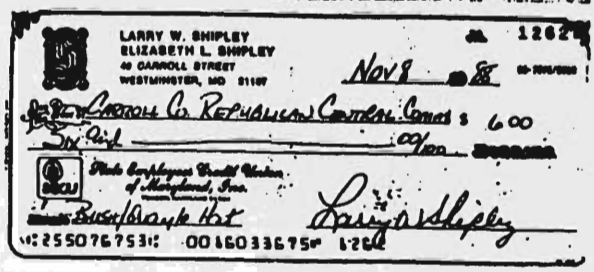
Diana L. Kellogg

:054901480:84 500008469 01# 0862

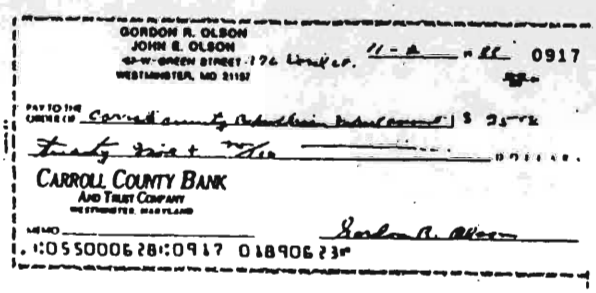
0004031148



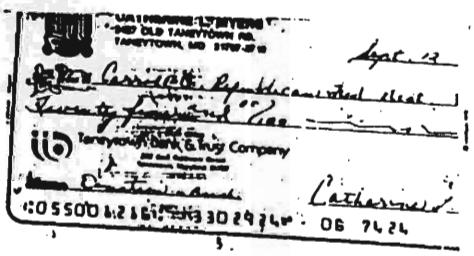
ROGER D. & KATHLEEN A. CHAMBERLAIN 3194
10-15 88
Pay To The Order Of Donna Harris $ 10.00
Ten dollars 00/100
The Citizens National Bank
For Tee Shirt Kathleen Chamberlain
:055000770:3194 000 26



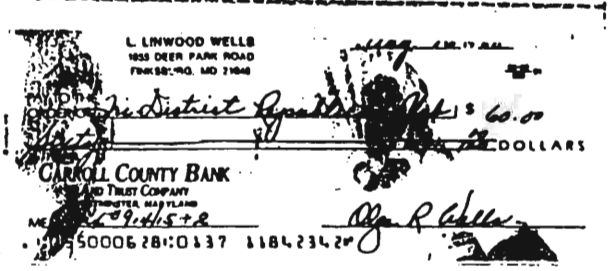
LARRY W. SHIPLEY 1262
ELIZABETH L. SHIPLEY
40 CARROLL STREET
WESTMINSTER, MD 21157
Nov 8 88
Pay To The Order Of Carroll Co. Republican Central Comm $ 6.00
Six and 00/100
Public Employees Credit Union of Maryland, Inc.
For Buck Blank Hat Larry W Shipley
:255076753: 00160336754 1262



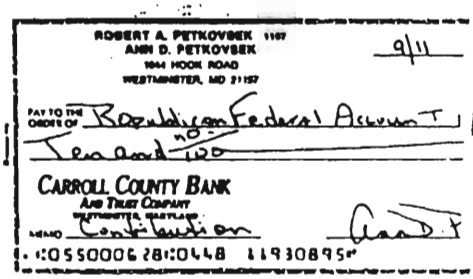
GORDON R. OLSON
JOHN E. OLSON
96 W. GREEN STREET 176 Liberty St. 11-8 88 0917
WESTMINSTER, MD 21157
PAY TO THE ORDER OF Carroll County Republican Central Committee $ 25.00
Twenty five + 00/100 DOLLARS
CARROLL COUNTY BANK
AND TRUST COMPANY
MEMO Gordon R. Olson
:055000628:0917 018906234



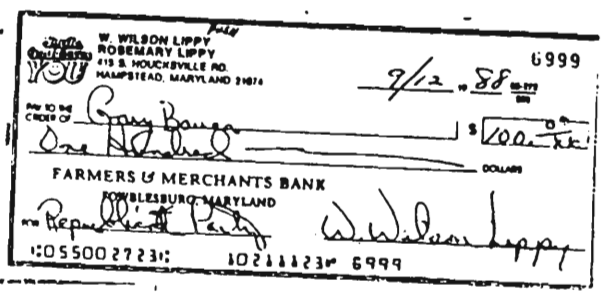
Sept 12
Pay To The Carroll Co. Republican Central Committee
Twenty Five and 00/100
Taneytown Bank & Trust Company
For Chairman Fund Catherine Reindollar
:055000628:0330 29734 06 7424



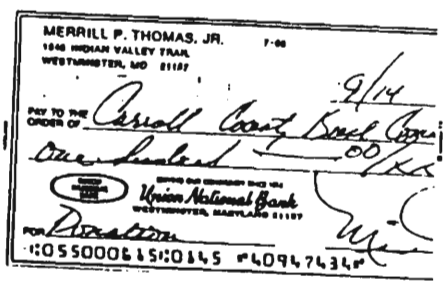
L. LINWOOD WELLS
1033 DEER PARK ROAD
FINKSBURG, MD 21048
PAY TO THE ORDER OF 7th District Republican Committee $ 60.00
Sixty DOLLARS
CARROLL COUNTY BANK
AND TRUST COMPANY
MEMO 109-415-8 Olga R Wells
:055000628:0137 118423427



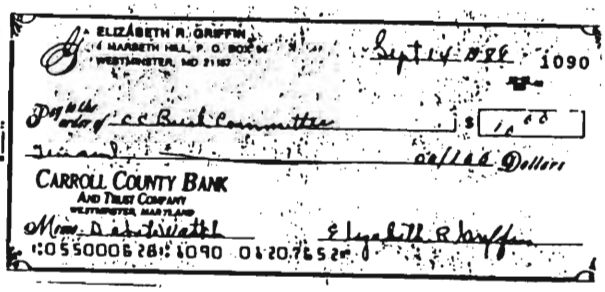
ROBERT A. PETKOVSEK 1107
ANN D. PETKOVSEK
1044 HOOK ROAD
WESTMINSTER, MD 21157
9/11
PAY TO THE ORDER OF Republican Federal Account
Ten and NO/100
CARROLL COUNTY BANK
AND TRUST COMPANY
MEMO Contribution Ann D P
:055000628:0448 119308954



W. WILSON LIPPY
ROSEMARY LIPPY
413 S. HOUCKSVILLE RD.
HAMPSTEAD, MARYLAND 21074
6999
9/12 88
PAY TO THE ORDER OF Carroll County Republican Committee $ 100.00
One Hundred and NO/100 DOLLARS
FARMERS & MERCHANTS BANK
FOWBLESBURG, MARYLAND
For Republican Party W. Wilson Lippy
:055002723: 10211123 6999

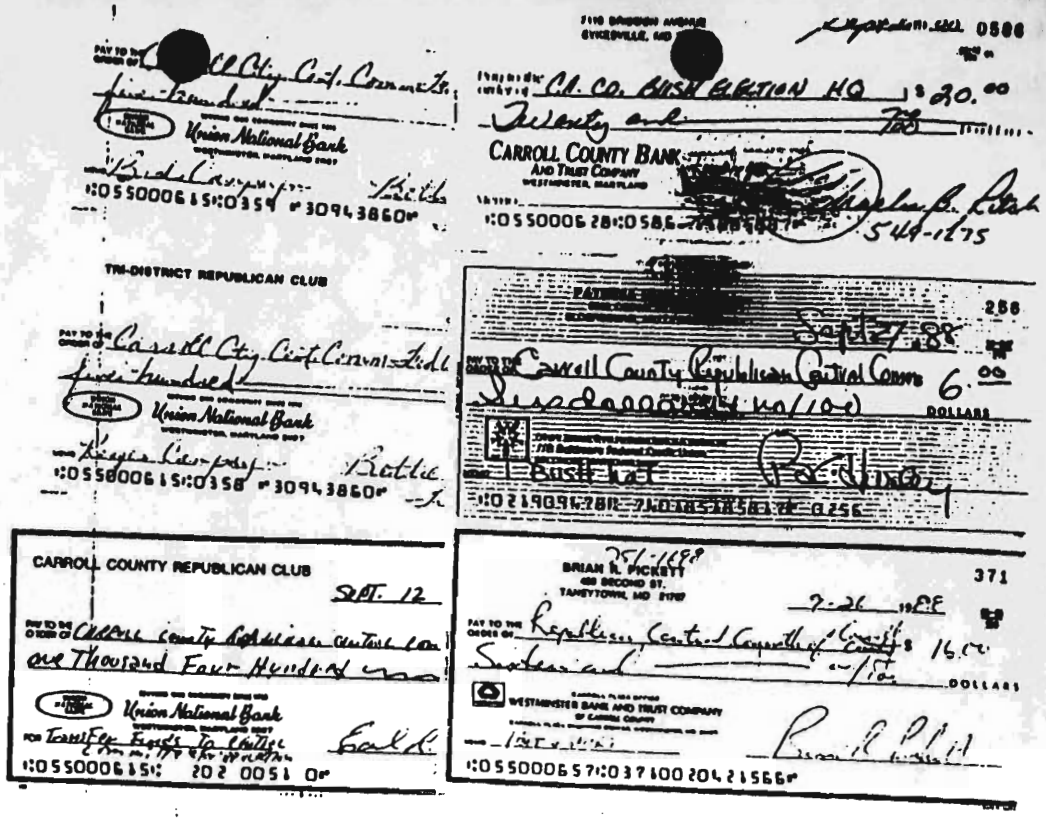


MERRILL P. THOMAS, JR.
1040 INDIAN VALLEY TRAIL
WESTMINSTER, MD 21157
9/14
PAY TO THE ORDER OF Carroll County Republican Committee
One Hundred and 00/100
Union National Bank
WESTMINSTER, MARYLAND 21157
For Donation
:055000615:0145 "409474347



ELIZABETH R. GRIFFIN
4 MARSETH HILL, P. O. BOX 84
WESTMINSTER, MD 21157
Sept 14 1988 1090
Pay to the order of CC Rep Committee $ 10.00
Ten and 00/100 Dollars
CARROLL COUNTY BANK
AND TRUST COMPANY
Mem Donation Elizabeth R Griffin
:055000628:1090 012076527

2000311419



Carroll City Cent. Committee
five hundred
Union National Bank
Bridal Corp.
:055000615:0359 3094 3860

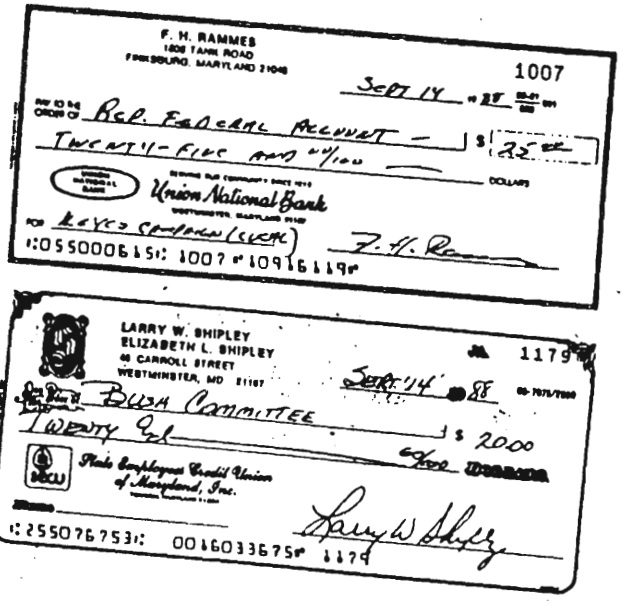
Cl. Co. BUSH ELECTION HQ $ 20.00
Twenty and
CARROLL COUNTY BANK AND TRUST COMPANY
544-1275

TRI-DISTRICT REPUBLICAN CLUB
Carroll City Cent. Committee
five hundred
Union National Bank
Bridal Corp.
:055000615:0358 3094 3860

Sept 27 88
Carroll County Republican Central Comm $ 6.00
Six dollars and no/100 DOLLARS
Bush Vol
:021909428: 256

CARROLL COUNTY REPUBLICAN CLUB
SEPT. 12
Carroll County Republican Central Co
one Thousand Four Hundred
Union National Bank
:055000615: 202 0051 0

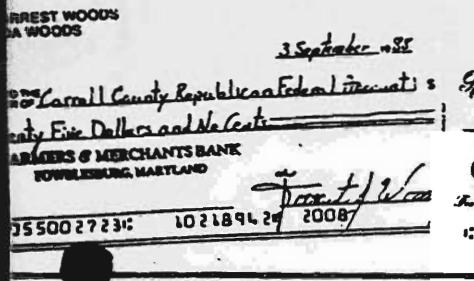
BRIAN S. PICKETT
371
7-26 19 88
Republican Central Committee of Carroll County $ 16.00
Sixteen and no/100 DOLLARS
WESTMINSTER BANK AND TRUST COMPANY OF CARROLL COUNTY
:055000657:037100204 21566

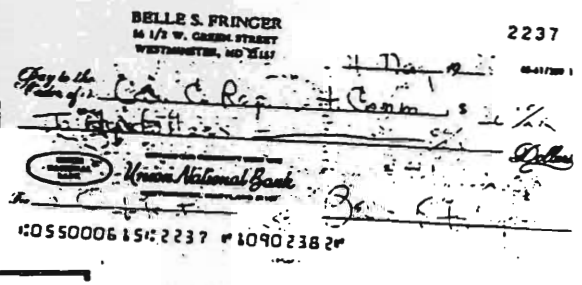


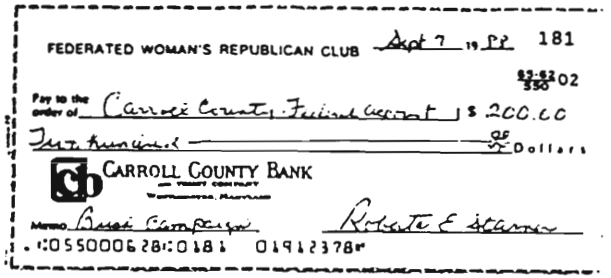
F. H. RAMMES
1808 TANK ROAD
1007
SEPT 14 88
Rep. Federal Account $ 25.00
Twenty-five and no/100 DOLLARS
Union National Bank
Keyes Campaign (cash)
F. H. Rammes
:055000615: 1007 0916 119

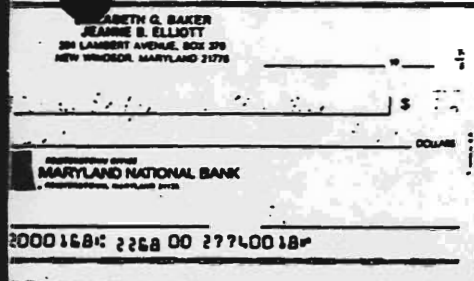
LARRY W. SHIPLEY
ELIZABETH L. SHIPLEY
48 CARROLL STREET
WESTMINSTER, MD 21157
1179
SEPT 14 88
Bush Committee $ 2000
Twenty and
State Employees Credit Union of Maryland, Inc.
Larry W Shipley
:255076753: 0016033675 1179

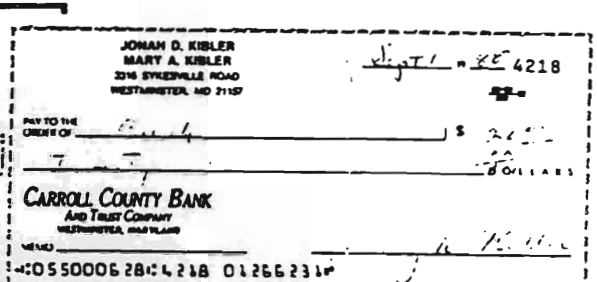
90040311420

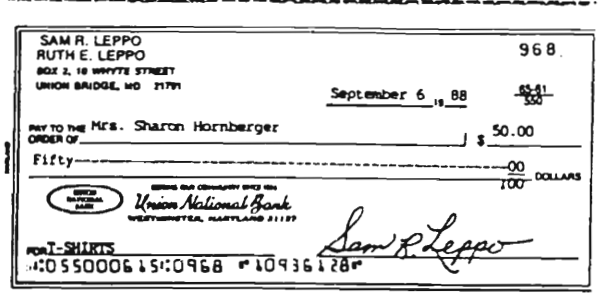

RREST WOODS
A WOODS
3 September 1988
Carroll County Republican Federal Account $
Five Dollars and No Cents
FARMERS & MERCHANTS BANK
FOWLERSBURG, MARYLAND
2008
:055002723: 1021894 2#


BELLE S. FRINGER
16 1/2 W. GREEN STREET
WESTMINSTER, MD 21157
2237
Pay to the Order of Ca. Co. Rep. Fed. Comm. $
Union National Bank
:055000615:2237 #1090238 2#

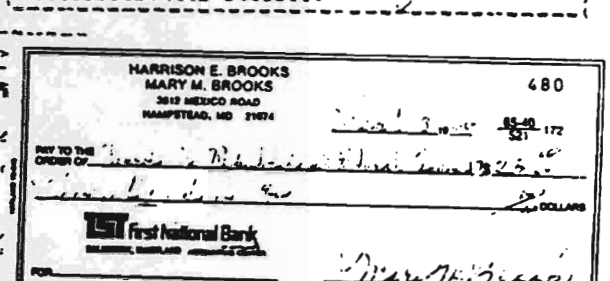

FEDERATED WOMAN'S REPUBLICAN CLUB Sept 7 19 88 181
Pay to the order of Carroll County Federal Account $ 200.00
Two hundred 00 Dollars
CARROLL COUNTY BANK
Memo Busi Campaign Roberta E Stamm
:055000628:0181 01912378#

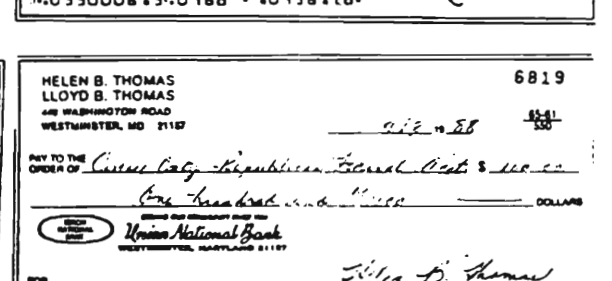

ELIZABETH G. BAKER
JEANNE B. ELLIOTT
334 LAMBERT AVENUE, BOX 379
NEW WINDSOR, MARYLAND 21776
MARYLAND NATIONAL BANK
2000168: 2268 00 2774001 8#

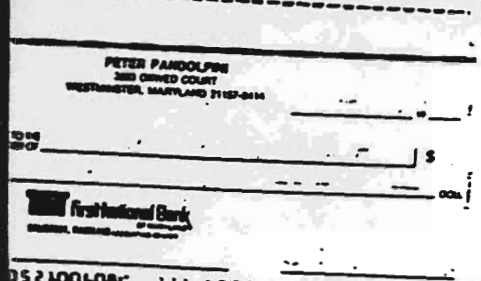

JOHAN D. KISLER
MARY A. KISLER
2316 SYKESVILLE ROAD
WESTMINSTER, MD 21157
Sept 1 19 88 4218
PAY TO THE ORDER OF $
CARROLL COUNTY BANK
AND TRUST COMPANY
:055000628:4218 01266231#

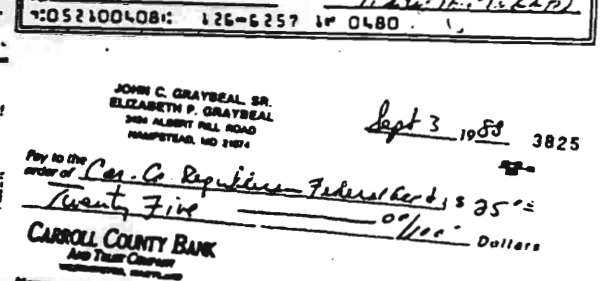

SAM R. LEPPO
RUTH E. LEPPO
BOX 2, 10 WHYTE STREET
UNION BRIDGE, MD 21791
968
September 6 19 88
PAY TO THE ORDER OF Mrs. Sharon Hornberger $ 50.00
Fifty 00/100 DOLLARS
Union National Bank
FOR T-SHIRTS Sam R Leppo
:055000615:0968 #109361 28#

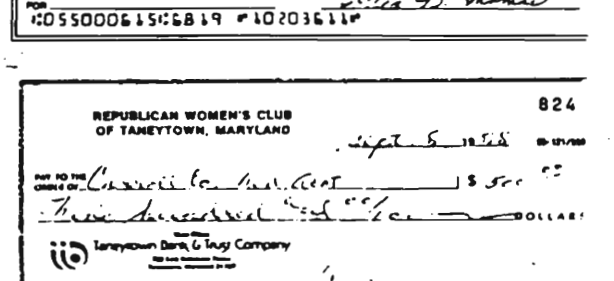

VESTA T. WAREHEIM
Sept 2 88
Carroll Co Rep Fed Account $ 25
Twenty-five 00/100 DOLLARS
Taneytown Bank & Trust Company
Vesta T Wareheim
:055 60155728 05 0117

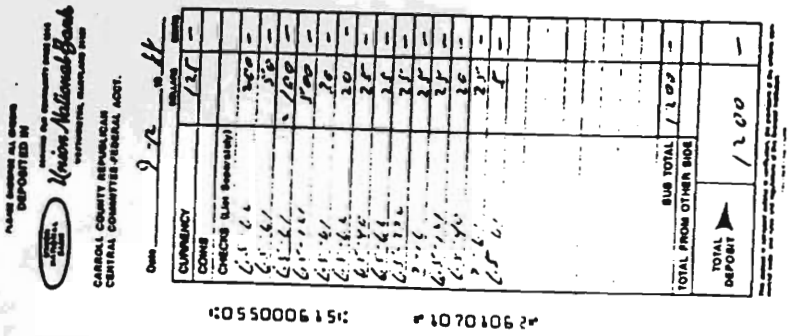

HARRISON E. BROOKS
MARY M. BROOKS
3612 MEXICO ROAD
HAMPSTEAD, MD 21074
480
Sept 3 19 88 55-40/521 172
PAY TO THE ORDER OF Carroll Co Republican Fed Comm $ 25.00
Twenty-five and 00/100 DOLLARS
First National Bank
FOR Mary M. Brooks
:052100408: 126-6257 1# 0480


HELEN B. THOMAS
LLOYD B. THOMAS
448 WASHINGTON ROAD
WESTMINSTER, MD 21157
6819
9/2 19 88 55-61/550
PAY TO THE ORDER OF Carroll Cnty Republican Federal Acct $ 100.00
One hundred and 00/100 DOLLARS
Union National Bank
FOR Helen B. Thomas
:055000615:6819 #102036 11#


PETER PANDOLFINI
3000 DIMED COURT
WESTMINSTER, MARYLAND 21157-6414
First National Bank
052100408: 111-4877 2# 2766


JOHN C. GRAYBEAL, SR.
ELIZABETH P. GRAYBEAL
3404 ALBERT RILL ROAD
HAMPSTEAD, MD 21074
Sept 3 1988 3825
Pay to the order of Car. Co Republican Federal Cmte $ 25.00
Twenty Five 00/100 Dollars
CARROLL COUNTY BANK
AND TRUST COMPANY
:055000628:3825


REPUBLICAN WOMEN'S CLUB
OF TANEYTOWN, MARYLAND
824
Sept 5 19 88
PAY TO THE ORDER OF Carroll Co Fed. Acct $ 500.00
Five hundred 00/100 DOLLARS
Taneytown Bank & Trust Company
:055001216: 3300233# 05 0824



CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Union National Bank

Date 9-12 19 88

CURRENCY	125	-
COINS		
CHECKS (List Separately)		-
	50	-
	100	-
	100	-
	20	-
	20	-
	25	-
	25	-
	25	-
	25	-
	25	-
	25	-
	25	-
	5	-
SUB TOTAL	1120	-
TOTAL FROM OTHER SIDE		-
TOTAL DEPOSIT	1120	-

:0550006151: #30709106 2#

ROBERT H. ROCHE
MILDRED A. ROCHE
1577 WARFIELD ROAD, 876-2913
WESTMINSTER, MD 21157

Sept 2 19 88 4071

Pay to the order of Carroll County Republican Federal Cmte $ 25.00

Twenty Five and 00 Dollars

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
HUNT VALLEY, MARYLAND 21030

Memo Henry Bush of Pres. Robert H Roche

:0520006181: 40 1000 14 396 34#

JAMES H. FLATER
MADELEINE E. FLATER
2546 HOLLINGSWORTH RD.
WESTERSTOWN, MD 21136

3069

19

Pay to the Order of $

Dollars

Union National Bank

For

:0550006151: 3069 #30909231#

9104021142

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1919

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-2 19 88

		DOLLARS	CENTS
CURRENCY			
COINS			
CHECKS (List Separately)			
~~7-16~~	~~✓~~	~~1000~~	~~—~~
7-16	✓	1000	—
7-12	✓	1000	—
7-16	✓	1000	—
65-77	✓	1000	—
15-52	✓	1000	—
65-296	✓	100	—
61-234	✓	100	—
52-470	✓	250	—
61-40	✓	175	—
7-1/520	✓	200	—
7-16	✓	200	—
67-1	✓	100	—
7-16	✓	100	—
61-316	✓	1000	—
61-223	✓	100	—
1-61	✓	1000	—
SUB TOTAL		8300	—
TOTAL FROM OTHER SIDE			
TOTAL DEPOSIT ➤		8300	—

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONITE • LLC • KONG

DUPLICATE

:055000615: "2 508 705 05" 0 0 0 4 0 3 1 1 4 2 3

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1910

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 10-29 19 84

		DOLLARS	CENTS	
CURRENCY		162	—	
COINS		0	50	
CHECKS (List Separately)				
65-245		6	—	
65-64		10	—	
65-40		6	—	
61-758	✓	1000	—	✓
61-256	✓	100	—	✓
7-16	✓	200	—	✓
7-39	✓	200	—	✓
7-1	✓	1000	—	✓
65-228	✓	1000	—	✓
SUB TOTAL		4114	50	
TOTAL FROM OTHER SIDE				
TOTAL DEPOSIT ➤		4114	50	

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

RECEIVER • Y/C • ITEMS

:051000615: "2 901 0701"

DUPLICATE

2 0 0 4 0 3 1 1 4 2 4

PLEASE ENDORSE ALL CHECKS
DEPOSITED

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1918

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-14 19 87

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
95-227 ✓	1.000	— ✓
95-82 ✓	500	— ✓
7-1 ✓	1'40	— ✓
SUB TOTAL	3'00	—
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	3500	—

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONITE • ILLC • ICP/B

:0550061 5: 0070106 2" 0 4 0 2 1 1 4 2 5

DUPLICATE

42200

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1918

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-22 19 87

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
60-35	212	52
SUB TOTAL	2.12	52
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	2.12	52

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONITE • ILLC • ICP/B

:0550061 5: 0070106 2"

DUPLICATE

EXHIBIT

I

				GENERAL C	GENERAL D	BUSH C	BUSH D	KEYS C	KEYS D	OTHER C	OTHER D	
1086	1/22	LESLIE JACOBY	(COMPUTER SERVICE)								✓ 2200 —	1
1087	11	GEORGE HELLYAR	(COMPUTER SERVICE)								✓ 1200 —	2
1088	1/22	POSTMASTER	(POSTAGE REFUND)								✓ 10657	3
1090	1/28	POSTMASTER	(POSTAGE REPORTS)		480 ✓							4
1091	2/5	INTERNATIONAL LIVING SERV.	(CONSULTING)								✓ 1000 —	5
1092	2/5	LESLIE JACOBY	(COMPUTER SERV)								✓ 432 85	6
1094	2/9	BALTO. CTY. VICTORY FUND	(TRANSFER)								55772	7
1095	2/9	CHRM. CITY REP. CENT'L COMM.	(TRANSFER)		* 36715 ✓		* 45702 ✓		* 16490 ✓			8
1096	2/10	POSTMASTER	(FEC REPORTS)		4 — ✓							9
1097	10 2/11	POSTMASTER	(FEC REPORTS)		480 ✓							10
1098	11 2/11	FREEDSTATE VICTORY	(TRANSFER)								✓ 5000 —	11
1099	12 2/13	POSTMASTER	(FEC REPORT)		4 — ✓							12
	13 2/23	REPORT TO OTHER	(EXCESS TRANSFER)							55772		13
1100	14 3/13	POSTMASTER	(FEC REPORTS)		2 — ✓							14
1101	15 3/25	POSTMASTER	(FEC REPORT)		4 — ✓							15
1102	16 3/14	POSTMASTER	(OTHER)								✓ 16674 45	16
	17				9075							17
	18											18
	19 4/21	UNION NAT'L BANK	115 E. MAIN ST WESTMR, MD. 21157	SVC CHRG & MDS. MAY & JUNE	4 20							19
	20 7/18	UNION NAT'L BANK	115 E. MAIN ST WESTMR, MD. 21157	SVC CHRG JULY	2 00							20
	21 8/2	L.E. WASHN	2710 CHILLUM RD. MT. RAINY MD 20711	POSTAGE-FEC REPORTS	5 75							21
	22											22
	23											23
	24											24
	25											25
	26											26
	27											27
	28											28
	29											29
	30											30
	31									55772	16674 45	31
	32											32

9 9 0 4 0 3 1 1 4 2 6

Year End Report

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JAN 31 PM 12:23

USE FEC MAILING LABEL OR TYPE OR PRINT

C00232603 N 235 122088
GARY WARREN BAUER
CARROLL COUNTY REPUBLICAN CENT
RAL COMMITTEE-FEDERAL ACCOUNT
PO BOX 2108
WESTMINSTER MD 21157

2. FEC IDENTIFICATION NUMBER
C00232603

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:
- ☐ February 20 ☐ June 20 ☐ October 20
- ☐ March 20 ☐ July 20 ☐ November 20
- ☐ April 20 ☐ August 20 ☐ December 20
- ☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 1/1/88 through 12/31/88		
6	(a) Cash on Hand January 1, 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 0	
	(c) Total Receipts (from Line 18)	$ 37076.38	$ 37076.38
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 37076.38	$ 37076.38
7	Total Disbursements (from Line 28)	$ 20243.70	$ 20243.70
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 16832.68	$ 16832.68
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Gary Warren Bauer

Signature of Treasurer
Gary W Bauer

Date
1/29/91

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

FEC FORM 3X
(revised 4/87)

C00232603 91036997 2 3 90

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 8, FEC FORM 3X)

Name of Committee (in full): Carroll County Republican Central Committee - Federal Account

Report Covering the Period From: 1/1/88 To: 12/31/88

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	13250.00	13250.00	11(a)(i)
(ii) Unitemized	13421.38	13421.38	11(a)(ii)
(iii) Total of contributions from individuals	26671.38	26671.38	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)	5000.00	5000.00	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	31671.38	31671.38	11(d)
TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	5005.00	5005.00	12
ALL LOANS RECEIVED	400.00	400.00	13
LOAN REPAYMENTS RECEIVED			14
OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
OTHER RECEIPTS (Dividends, Interest, etc.)			17
TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	37076.38	37076.38	18
II. DISBURSEMENTS			
OPERATING EXPENDITURES	15035.75	15036.76	19
TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1500.00	1500.00	20
CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	999.00	999.00	21
INDEPENDENT EXPENDITURES (use Schedule E)			22
COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
LOAN REPAYMENTS MADE	400.00	400.00	24
LOANS MADE			25
REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
OTHER DISBURSEMENTS	2307.79	2307.79	27
TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	20243.79	20243.79	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	31671.38	31671.38	29
TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	31671.38	31671.38	31
TOTAL OPERATING EXPENDITURES (from Line 19)	15035.75	15036.76	32
OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
NET OPERATING EXPENDITURES (subtract Line 33 from 32)	15035.75	15036.76	34

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 2

FOR LINE NUMBER 11(a)

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)

Carroll County Republican Central Committee - Federal Account C00232503

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Daniel Oliver 3105 Woodley Rd. N.W. Washington, D.C. 20008 ✓	Information Requested	9/23/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > $ 1000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Shaukat A. Aghai 11190 Heatherton La. Columbia, MD. 21044 ✓	Information Requested	10/11/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > $ 1000.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Tariq Mahmood, M.D. 10701 Balantra La. Potomac, MD. 20854 ✓	Self	10/11/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Physician		
	Aggregate Year-to-Date > $ 1000.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Parvez Shah, M.D. 5105 Dustin Rd. Burtonsville, MD. 20866 ✓	Self	10/12/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Physician		
	Aggregate Year-to-Date > $ 1000.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ann McLaughlin 2019 Garfield St. N.W. Washington, DC. 20008 ✓	Information Requested	10/17/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $ 1000.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ruth H. Kraut 10021 Juniper Rd. Finksville, MD. 21087 ✓		10/21/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Housewife		
	Aggregate Year-to-Date > $ 1000.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Henry A. Rosenberg,Jr. C.C.C. Box 1159 Dallas, TX. 75221 ✓	Crown Central Petroleum	10/24/88	$1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Executive		
	Aggregate Year-to-Date > $ 1000.00		
SUBTOTAL of Receipts This Page (optional)			$7000.00
TOTAL This Period (last page this line number only)			

8703381372 1

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 2 OF 2

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Lawrence R. Rachuba 700 Fairmount Ave. Towson, MD. 21204 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	The De Chiaro-Rachuba Group Occupation: Executive Aggregate Year-to-Date > $ 1000.00	10/25/89	$1000.00
B. Full Name, Mailing Address and ZIP Code John B. Burchham, Jr. 6021 Nashville Rd. Lanham, MD. 20706 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Aggregate Year-to-Date > $ 1000.00	10/26/89	$1000.00
C. Full Name, Mailing Address and ZIP Code C. Dale Haas 3501 Pallston Rd. Pallston, MD. 21047 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Real Estate Aggregate Year-to-Date > $ 1000.00	10/26/89	$1000.00
D. Full Name, Mailing Address and ZIP Code Joan M. Shannon 6911 Holton La. Temple Hills, MD. 20748 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Aggregate Year-to-Date > $ 250.00	10/27/89	$ 250.00
E. Full Name, Mailing Address and ZIP Code Jayne H. Plank 10005 Frederick Ave. Kensington, MD. 20895 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Aggregate Year-to-Date > $ 500.00	10/28/89	$ 500.00
F. Full Name, Mailing Address and ZIP Code Donald J. Alegal, Sr. 20 Oakway Rd. Timonium, MD. 21093 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Aggregate Year-to-Date > $ 500.00	11/7/89	$ 500.00
G. Full Name, Mailing Address and ZIP Code Tudor Manor Partnership 23 Ellendale St. Bel Air, MD. 21014 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Aggregate Year-to-Date > $ 2000.00	11/7/89	$2000.00
SUBTOTAL of Receipts This Page (optional)			$5250.00
TOTAL This Period (last page this line number only)			$11250.00

SCHEDULE A — ITEMIZED RECEIPTS

Use separate sch... for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232501

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Drive Political Fund 25 Louisiana Ave. N.W. Washington, DC. 20001 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 5000.00	10/31/89	$5000.00
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)			
TOTAL This Page (last page this line number only)			$5000.00

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 12

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code Westminster Republican Women's Club 1801 Bachmans Valley Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 200.00	Date (month, day, year) 9/12/88	Amount of Each Receipt this Period $ 200.00
B. Full Name, Mailing Address and ZIP Code South Carroll Republican Club 2910 Gillis Rd. Mt. Airy, MD. 21771 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 200.00	Date (month, day, year) 9/28/88	Amount of Each Receipt this Period $ 200.00
C. Full Name, Mailing Address and ZIP Code Tri-District Republican Club P.O. Box 471 Finksburg, MD. 21048 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $1055.00	Date (month, day, year) 9/29/88	Amount of Each Receipt this Period $1055.00
D. Full Name, Mailing Address and ZIP Code Carroll County Republican Club c/o Leister's Church Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $1400.00	Date (month, day, year) 9/29/88	Amount of Each Receipt this Period $1400.00
E. Full Name, Mailing Address and ZIP Code Taneytown Republican Women's Club 727 Sullivan Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 1150.00	Date (month, day, year) 10/22/88	Amount of Each Receipt this Period $1150.00
F. Full Name, Mailing Address and ZIP Code Bentley Re-Elect Committee Inc. 88 P.O. Box 10510 Towson, MD. 21285 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $1000.00	Date (month, day, year) 10/29/88	Amount of Each Receipt this Period $1000.00
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)			$6105.00

C00232603 31742 32

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 1

FOR LINE NUMBER 13

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
G. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	Mills Communications	8/17/88	$ 400.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Self		
	Aggregate Year-to-Date > $ 400.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date > $		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$ 400.00

C00232603 4 740 53 3

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 3

FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert Frey c/o Larry Hainen 140 Village Shopping Center Westminster, MD. 21157	Headquarter Lease Disbursement for [ ] Primary [ ] General [ ] Other (specify)	8/29/88	$ 500.00
B. Full Name, Mailing Address and ZIP Code Swain Supply, Inc. c/o Donald Taylor P.O. Box 513 Westminster, MD. 21157	Purpose of Disbursement supplies for dinner Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 8/31/88	Amount of Each Disbursement This Period $ 240.40
C. Full Name, Mailing Address and ZIP Code C & P Telephone P.O Box 557 Balto., MD. 21265	Purpose of Disbursement phone for HQ Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 305.49
D. Full Name, Mailing Address and ZIP Code Frank Rammen 1906 Tank Rd. Finksburg, MD. 21048	Purpose of Disbursement postage Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 8/25/88	Amount of Each Disbursement This Period $ 204.25
E. Full Name, Mailing Address and ZIP Code Kenneth Anderer P.O. Box 114 Braddock Height, MD. 21714	Purpose of Disbursement T-shirts Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 8/17/88	Amount of Each Disbursement This Period $ 488.25
F. Full Name, Mailing Address and ZIP Code Johnson Graphics, Inc. 620 Old Westminster Pike Westminster, MD. 21157	Purpose of Disbursement letterhead, Pamphlets Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 529.04
G. Full Name, Mailing Address and ZIP Code Vince's Seafood, Inc. 119 W. Main St. Westminster, MD. 21157	Purpose of Disbursement food for dinner Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 2009.00
H. Full Name, Mailing Address and ZIP Code Staley Bros. 623 Old Baltimore Rd. Westminster, MD. 21157	Purpose of Disbursement food for dinner Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 919.00
I. Full Name, Mailing Address and ZIP Code Tree Shoeing 63 Carroll St. Westminster, MD. 21157	Purpose of Disbursement Band for dinner Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 295.00
SUBTOTAL of Disbursements This Page (optional)			$5499.43
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 3

FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Pleasant Valley Fire Dept. 2220 Pleasant Valley Rd. Westminster, MD. 21157	Hall for dinner Disbursement for [ ] Primary [ ] General [ ] Other (specify)	9/3/88	$ 962.00
B. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	postage Disbursement for [ ] Primary [ ] General [ ] Other (specify)	9/29/88	$ 300.00
C. Full Name, Mailing Address and ZIP Code Landmark Publications P.O. Box 345 Westminster, MD. 21157	Advertisements Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/5/88	$ 349.61
D. Full Name, Mailing Address and ZIP Code Maryland Victory '88 2323 York Rd. Timonium, MD. 21093	political supplies Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/12/88	$ 711.00
E. Full Name, Mailing Address and ZIP Code Friendly Farms 1011 Baltimore Blvd. Westminster, MD. 21157	Breakfast Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/12/88	$ 554.30
F. Full Name, Mailing Address and ZIP Code Photon Print Shop P.O. Box 193 Westminster, MD. 21157	letters, pamphlets Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/14/88	$ 493.94
G. Full Name, Mailing Address and ZIP Code Landmark Publications P.O. Box 345 Westminster, MD. 21157	Advertisements Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/20/88	$ 914.75
H. Full Name, Mailing Address and ZIP Code Landmark Publications P.O. Box 345 Westminster, MD. 21157	Sample Ballots Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/20/88	$ 541.30
I. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	postage Disbursement for [ ] Primary [ ] General [ ] Other (specify)	10/20/88	$ 255.00
SUBTOTAL of Disbursements This Page (optional)			$4,991.90
TOTAL This Period (last page this line number only)			

13 49 3 3 11 8 7 4 2 3 7 5

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 03 — FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Carroll Sun Sherwood Square Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 230.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	Bulk-Rate Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 205.08
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publicantions P.O. Box 346 Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/25/88	$ 262.24
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WTTR 101 WTTR La. Uniontown Rd. Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	11/1/88	$ 325.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sharon Hornberger 30 Chase St. Westminster, MD. 21157	pins for volunteers Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	11/2/88	$ 204.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ambassador John Gavin 2121 Avenue of the Stars Suite 3300 Los angeles, Calif. 90067	outside service Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/14/88	$2012.59
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Admiral Limousine Service 1104 Princess At. Alexandria, VA. 22314	outside Srevice Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/14/88	$ 460.50
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
International Limousine Service 1515 Annapolis Rd. Bowie, MD. 21220	outside service Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/30/88	$ 500.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/15/88	$ 325.00
SUBTOTAL of Disbursements This Page (optional)			$3,573.53
TOTAL This Period (last page this line number only)			$12,111.53

0 0 2 4 0 3 3 9 1 3 0 3 9 6

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 68

FOR LINE NUMBER 20

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Commitee - Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Bentley Re-Elect Committee Inc. 88 P.O. Box 10619 Towson, MD 21286	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/7/88	$1000.00
B. Full Name, Mailing Address and ZIP Code Carroll County Republican Central Committee P.O. Box 2109 Westminster, MD. 21157	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/1/88	$ 500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$1500.00

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 21

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Allan Keyes for Senate 8115 Fenton St.,Suite 314 Silver Spring, MD. 20910	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/21/98	$ 999.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$ 999.00

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 21

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code J. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/15/89	$ 400.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$ 400.00

FEC 3.91374139

January Monthly

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEC 6
DI

89 FEB 21 AM 11:53

TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) [ ] Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, MD. 21074

2 FEC IDENTIFICATION NUMBER
C00232603

3 [ ] This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a)
- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] Termination Report

Monthly Report Due On:
- [X] February 20
- [ ] March 20
- [ ] April 20
- [ ] May 20
- [ ] June 20
- [ ] July 20
- [ ] August 20
- [ ] September 20
- [ ] October 20
- [ ] November 20
- [ ] December 20
- [ ] January 31

- [ ] 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 _____

(b) Is this Report an Amendment? [ ] YES [ ] NO

SUMMARY

Covering Period 1/1/89 through 1/31/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 89		$ 16832.68
	(b) Cash on Hand at Beginning of Reporting Period	$ 16832.68	
	(c) Total Receipts (from Line 18)	$ 190.23	$ 190.23
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 17022.91	$ 17022.91
7	Total Disbursements (from Line 28)	$ 3532.67	$ 3532.67
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 13490.24	$ 13490.24
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Gary Warren Bauer

Signature of Treasurer
Gary Warren Bauer

Date

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

FEC FORM 3X

Revised 4/87

DETAILED SUMMARY PAGE

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

Name of Committee (in full): Carroll County Republican Central Committee-Federal Account

Report Covering the Period: From 1/1/89 To 1/31/89

	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			
(i) Itemized (use Schedule A)			11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))			11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13 ALL LOANS RECEIVED			13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	190.23		15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)			17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	190.23		18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	3400.00		19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24 LOAN REPAYMENTS MADE			24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a) (b) and (c))			26(d)
27 OTHER DISBURSEMENTS	132.57		27
28 TOTAL DISBURSEMENTS (add 19 20 21 22 23 24 25 26(d) and 27)	3532.57		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	0		29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0		30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	0		31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	3400.00		32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	190.23		33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	3209.77		34

8 1 7 3 2 9 3

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00212503

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Leslie Jacoby 1740 Weston Ave. Parkville, MD. 21234	computer rental Disbursement for [ ] Primary [ ] General [ ] Other (specify)	1/27/89	$ 2200.00
B. Full Name, Mailing Address and ZIP Code Marge Newman 4226 Thornclift Rd. Balto., MD. 21236	computer rental Disbursement for [ ] Primary [ ] General [ ] Other (specify)	1/27/89	$ 1200.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page with this Line Number)

$ 3400.00

8 1 3 8 1 3 3 7 7

DETAILED SUMMARY PAGE

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

Name of Committee (in full) Carroll County Republican Central Committee-Federal Account	Report Covering the Period From 2/1/89 To 2/28/89		
	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			
(i) Itemized (use Schedule A)			11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))			11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13 ALL LOANS RECEIVED			13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		130.23	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)			17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		130.23	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	1432.87	4932.87	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	10889.00	10889.00	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24 LOAN REPAYMENTS MADE			24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27 OTHER DISBURSEMENTS	12.93	105.97	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	12334.80	15967.36	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))			29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)			31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	1432.87	4932.87	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)		130.23	33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	1432.87	4802.64	34

FEC 3X 2.4 0 1 1 4 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEC ACTION

89 MAR 20 AM 11:35

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) ☐ Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, Maryland 21074

2 FEC IDENTIFICATION NUMBER
C00232603

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:
- ☐ February 20
- ☒ March 20
- ☐ April 20
- ☐ May 20
- ☐ June 20
- ☐ July 20
- ☐ August 20
- ☐ September 20
- ☐ October 20
- ☐ November 20
- ☐ December 20
- ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 2/1/89 through 2/28/89		
6	(a) Cash on Hand January 1, 19 89	[redacted]	$ 16932.69
	(b) Cash on Hand at Beginning of Reporting Period	$13490.24	[redacted]
	(c) Total Receipts (from Line 18)	$ 0	$ 190.23
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$13490.24	$ 17022.91
7	Total Disbursements (from Line 28)	$12334.69	$ 15367.35
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1155.55	$ 1155.56
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Mary Warren Bauer

Signature of Treasurer
Mary Warren Bauer

Date
3/14/89

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

FEC FORM 3X
(revised 4 87)

OGC 4125

LAW OFFICES
STONER, PRESTON & BOSWELL, CHARTERED
188 EAST MAIN STREET
POST OFFICE BOX 389
WESTMINSTER, MARYLAND 21157-0389

CHARLES E STONER
CHARLES M. PRESTON
RICHARD V. BOSWELL
DAVID H. PRATT
LORI JOY EISNER

TELEPHONE 301
WESTMINSTER 848-7777
BALTIMORE 876-7371
FAX 876-0769

September 27, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Office of General Counsel
Federal Election Commission
Room 659
999 E Street N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP 28 PM 2:55
RECEIVED

Attn: Lawrence M. Nobel, General Counsel

RE: MUR 2936 - Gary W. Bauer

Dear Mr. Nobel:

Enclosed herewith please find our Answers to Interrogatories and the attached documents as a response to your Request for Production of Documents.

I have also enclosed herewith a Statement of Designation of Counsel.

Furthermore, my client has authorized me to pursue pre-probable cause conciliation and I would hereby ask you to accept this letter as our written request for same.

Please feel free to contact me for any further information regarding this matter.

Very truly yours,

STONER, PRESTON & BOSWELL, CHARTERED

Richard V. Boswell

RVB/caw
Enclosures
cc: Mr. Gary W. Bauer

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: Richard V. Boswell

ADDRESS: Stoner, Preston & Boswell, Chartered
188 East Main Street, P.O. Box 389
Westminster, Maryland 21157-0389

TELEPHONE: (301) 848-7777 - 876-7371

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

9/14/89
Date

Signature
GARY WARREN BAUER

RESPONDENT'S NAME: GARY WARREN BAUER

ADDRESS: 924 Century Street
Hampstead, Maryland 21074

HOME PHONE: (301) 239-8309

BUSINESS PHONE: (301) 396-0446

2300311446

GARY WARREN BAUER * FEDERAL
Respondent * ELECTION
* COMMISSION
* IN RE: MUR 2936
*

* *

ANSWERS TO INTERROGATORIES

Now comes, GARY WARREN BAUER, Respondent herein, and in answer to the Interrogatories heretofore propounded, says:

(a.) The information contained in the answers to these Interrogatories is not based solely on the information of the executing party, but includes the knowledge of the party's agents, representatives and attorney, unless privileged.

(b.) The word usage and sentence structure is that of the attorney and does not purport to be the exact language of the executing party.

INTERROGATORY NO. 1: Describe the role and activities of the Carroll County Republican Central Committee Federal Account ("Federal Account") with respect to the Victory '88 program and the Bush/Quayle campaign in Maryland in 1988.

ANSWER TO INTERROGATORY NO. 1:

The Carroll County Republican Central Committee Federal Account served as a means to pay expenses of the Bush/Quayle campaign in Maryland.

2 1 4 4 4 7

Monies raised by the Victory '88 program and the Bush/Quayle campaign in Maryland were placed in the Federal Account of the Carroll County Republican Central Committee.

There were two ways by which I would receive instructions to pay bills. On some occasions, I would receive an invoice and pay same. On other occasions, I would receive verbal instruction from Congresswoman Helen Delich Bentley, ((business address) 1610 Longworth House Office Building, Washington, D.C. 20515, (202) 225-3061, (residence address) 200 E. Joppa Road, Towson, Maryland 21204, (301) 337-7222), to Mrs. Sharon Hornberger, (30 Chase Street, Westminster, Maryland 21157, (301) 848-1034, Administrative Assistant to Senator Raymond Beck (Dist. 5), 189 East Main Street, Westminster, Maryland 21157, 848-4460, 410 James Senate Office Building, Annapolis, Maryland, 841-3683/ (800) 492-7122).

There were no distinctions as to whether an expense was from Victory '88 or the Bush/Quayle campaign.

INTERROGATORY NO. 2: Identify all persons who controlled or directed the receipt and disbursement of funds deposited into the Federal Account with respect to the Victory '88 program or the Bush/Quayle campaign, and identify each receipt and disbursement so controlled or directed.

2004031443

ANSWER TO INTERROGATORY NO. 2:

My understanding is that the Victory '88 monies came from Richard Taylor, Esquire, (14908 Spring Meadow Drive, Germantown, Maryland 20874, 840-5720, Committeeman Republican National Committee) to Helen Bentley.

Sharon Hornberger received both the Victory '88 and Bush/Quayle monies from Helen Bentley and presented them to me for deposit into the Federal Account.

Disbursements came to me again from Helen Bentley through Sharon Hornberger.

The following checks are from Victory '88:

1. Tariq Mahmood, M.D., Reama Mahmood, 10701 Balantre Lane, Potomac, Maryland 20854, $1,000.00.

2. Daniel Oliver, Louise V. Oliver, 3105 Woodley Road N.W., Washington, D.C. 20008, $1,000.00.

3. Leonard A. Kraus, Ruth N. Kraus, 10901 Juniper Road, Kingsville, Maryland 21087, $1,000.00.

4. Lawrence R. Rachuba, $1,000.00.

5. Peter Zourdos, 5101 River Road, Bethesda, Maryland 20816, $100.00.

6. Ann McLaughlin, 2918 Garfield Street N.W., Washington, D.C. 20008, $1,000.00.

7. Parvez Shah, M.D., Birjees Shah, 4405 Dustin Road, Burtonsville, Maryland 20866, $1,000.00.

8. Shaukat A. Ashai, Asmat R. Ashai, 11380 Heathertoe Lane, Columbia, Maryland 21044, $1,000.00.

9. Leonard L. Abel, 405 Scott Drive, Silver Springs, Maryland 20900, $100.00.

10. James P. Goldsmith, Sally S. Goldsmith, 1512 Bolton Street, Baltimore, Maryland 21217, $150.00.

11. Jean M. Shannon, John W. Shannon, 5811 Holton Lane, Temple Hills, Maryland 20747, $250.00.

12. Andrew Manos, 6905 Millwood Road, Bethesda, Maryland 20817, $100.00.

13. Kenneth J. Burke, 103 Park Lane, Baltimore, Maryland 21210, $100.00.

14. Robert B. Barnhill, Margaret K. Barnhill, 6607 Weymouth Court, Baltimore, Maryland 21212, $100.00.

15. Joseph Payne, Susan Frick Payne, 204 Witherspoon Road, Baltimore, Maryland 21212, $200.00.

16. John J. Foster, Jr., 1510 Dulaney Valley Road, Lutherville, Maryland 21093, $200.00.

17. William R. Rothe, Gay Frederick Rothe, 4000 Tunlaw Road, NW No. 507, Washington, D.C. 20007, $200.00.

18. Jayne H. Plank, 10005 Frederick Avenue, Kensington, Maryland 20895, $500.00.

The following checks are from Bush/Quayle:

1. Drive Political Fund, 25 Louisiana Avenue, N.W., Washington, D.C. 20001, $5,000.00.

2. Tudor Manor Partnership, 23 Ellendale Street, Bel Air, Maryland 21014, $2,000.00.

3. Ronald G. Alessi, Sr., Kathleen S. Alessi, 30 Oakway Road, Timonium, Maryland 21093, $500.00.

4. John B. Burcham, Jr., 6921 Nashville Road, Lanham, Maryland 20706, $1,000.00.

5. W. Dale Hess, Marie R. Hess, Falston, Maryland 21047, $1,000.00.

6. Bentley Re-Elect Committee, Inc. 88, P.O. Box 10619, Towson, Maryland 21285, $1,000.00. See attached Exhibits I and II.

The following are disbursements from the funds:

1. Bentley Re-Elect Committee, Inc. 88 (1073), P.O. Box 10619, Towson, Maryland 21285, $1,000.00.

2. Scott B. Marks (1077) $168.00 (photos).

3. Ambassador John Gavin (1081), $2,012.68 (expenses).

4. Admiral Limousine Service (1082) $460.50.

5. Postmaster (1083) $375.00 (postage).

6. Printing Plus (1084) $176.91.

7. International Limousine Service (1085) $500.00.

8. Leslie Jacoby (1086) $2,200.00 (computer service).

0004081-451

9. Marge Newman (1087) $1,200.00 (computer service).

10. Printing Plus (1089) $106.57 (letterhead).

11. International Limousine Service (1091) $1,000.00 (shuttle).

12. Leslie Jacoby (1092) $432.89 (computer service).

13. Baltimore County Victory Fund (1094) $5,000.00 (transfer).

14. Freestate Victory (1098) $5,000.00 (transfer).

15. Postmaster (1102) $1,067.45 (postage). See attached Exhibits III and IV.

INTERROGATORY NO. 3: With respect to the attached list of persons whose contribution checks were deposited into the Federal Account, state the date you received each contribution and identify the person from whom you received each contribution. State whether you were provided with the name, address, and date of receipt for these contributions by the person who forwarded them to the Federal Account.

ANSWER TO INTERROGATORY NO. 3:

As I have stated previously, I received these contributions from Sharon Hornberger who had received them from Helen Bentley. When I received them I was not told when and where these contributions were raised.

A check was received on October 28, 1988, from Jayne H. Plank, 10005 Frederick Avenue, Kensington, Maryland 20895.

The following checks were received November 2, 1988:

1. Daniel Oliver, 3105 Woodley Road, N.W., Washington, D.C. 20008.

2. Tariq Mohmood, M.D., 10701 Balantre Lane, Potomac, Maryland 20854.

3. Ann McLaughlin, 2918 Garfield Street, N.W., Washington, D.C. 20008.

4. Peter Zourdos, 5101 River Road, Bethesda, Maryland 20816.

5. James P. Goldsmith, 1512 Bolton Street, Baltimore, Maryland 21217.

6. Kenneth Burke, 103 Park Lane, Baltimore, Maryland 21210.

7. Joseph Payne, 2004 Witherspood Road, Baltimmore, Maryland 21212.

8. Shaukat A. Ashal, 11380 Heathertoe Lane, Columbia, Maryland 21044.

9. Parvez Shah, M.D. 4405 Dustin Road, Burtonsville, Maryland 20866.

10. June Abel, 408 Scott Drive, Silver Spring, Maryland 20900.

11. Andrew Manos, 6905 Millwood Road, Bethesda, Maryland 20917.

12. Robert B. Barnhill, 6607 Weymouth Court, Baltimore, Maryland 21212.

13. John J. Foster, Jr., 1510 Dulaney Valley Road, Lutherville, Maryland 21093.

INTERROGATORY NO. 4: State whether the notation "CCRCCFA" was included on the "pay to the order to" line of these checks at the time you received them. Identify the person(s) who added "CCRCCFA" to the "pay to the order to" line of these checks.

ANSWER TO INTERROGATORY NO. 4:

Of those checks in question, only the check from Jayne H. Plank did not contain the notation "C.C.R.C.C.F.A." when received by me. Her check payee line read "FS Victory 88".

I have no knowledge as to who placed the notation in question on the payee line.

INTERROGATORY NO. 5: Identify all persons known to you to have handled in any way the checks representing the contributions from the person on the attached list prior to your receiving them.

ANSWER TO INTERROGATORY NO. 5:

My understanding is that Richard Taylor forwarded the checks to Helen Bentley. Mrs. Bentley presented them to Sharon Hornberger who presented them to me.

INTERROGATORY NO. 6: With respect to all contributions in excess of $200 that you received and deposited into the Federal Account, state whether you were provided with the occupation and employer for each contributor. State what efforts you made to obtain the occupation and employer for all contributions in excess of $200 that you deposited into the Federal Account.

ANSWER TO INTERROGATORY NO. 6:

In regard to the monies in question, those contributions in excess of $200.00, I was not provided with the occupation nor the employer of the contributors when I received them.

I informed Mrs. Hornberger of this matter because of the requirement in filing the FEC reports. She informed me to contact Sandy Morgan (301-561-1777), Mrs. Bentley's secretary, who would provide the additional information. I contacted Ms. Morgan and she was able to provide information on some of the contributors but not all.

2040314345

Ms. Morgan told me to place "information requested" on the FEC report and she would obtain the necessary information and forward it to me. As of my termination as treasurer on April 18, 1989, I had not received the information in question.

INTERROGATORY NO. 7: State all reasons why the reports you filed for the Federal Account reported the date of the check as the date of the contribution rather than the date of receipt, either the date you received the contribution or the date the person who forwarded the contribution to you received it as appropriate.

ANSWER TO INTERROGATORY NO. 7:

Not being an accountant nor previously being a treasurer of a Federal Account, I was unaware of the law's requirement regarding the date line. As the dates on the first report were not questioned, I continued to use the dates of the checks on all FEC forms. If this matter had been brought to my attention, I would have used the appropriate date.

INTERROGATORY NO. 8: Identify all persons with whom you have had communications subsequent to the 1988 general election regarding the receipt and disbursement of the contributions from the persons on the attached list and describe each communication and the date it occurred.

2004031456

ANSWER TO INTERROGATORY NO. 8:

Again, as stated, all my communications have been with Sharon Hornberger, Sandy Morgan and on only a few occasions with Helen Bentley. As I did not keep a telephone log or daily journal, I cannot recall dates or times of conversations.

INTERROGATORY NO. 9: Provide copies of all documents relevant to your responses to the above questions.

ANSWER TO INTERROGATORY NO. 9: See attached Exhibits I, II, III and IV.

GARY WARREN BAUER, Respondent

Richard V. Boswell, Esquire
STONER, PRESTON & BOSWELL, CHARTERED
188 East Main Street, P.O. Box 389
Westminster, Maryland 21157-0389
848-7777 - 876-7371
Attorney for Respondent

I do solemnly declare and affirm under the penalties of perjury that the contents of the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

GARY WARREN BAUER, Respondent

2004061457

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of September, 1989, a copy of the foregoing Answers to Interrogatories was mailed, Certified Mail - Return Receipt Requested, to the Office of General Counsel, Federal Election Commission, Room 659, 999 E. Street, N.W., Washington, D.C. 20463.

Richard V. Boswell, Esquire

2004011438

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING [redacted] COMMUNITY SINCE 1816

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-14 19 84

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
65-229 ✓	2.000	— ✓
75-82 ✓	500	— ✓
7-1 ✓	1'40	— ✓
SUB TOTAL	3'00	—
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	3.500	--

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • ILC • KORB

:0550006 5:

:0702062 2:

DUPLICATE

42369

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1816

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-22 19 84

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
65-35	217	52
SUB TOTAL	2.17	52
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	2.17	52

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • ILC • KORB

:0550006 5:

:0702062 2:

DUPLICATE

:0 4 0 3 1 1 4 5 9

EXHIBIT

I

DRIVE POLITICAL FUND
35 LOUISIANA AVE., N.W.
WASHINGTON, D.C. 20001

10154

October 31, 1988

PAY TO THE ORDER OF C.C.R.C.F.A. - '88 $ 5,000.00

Five Thousand Dollars and No Cents ---------- DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

William D. Quarles
William J. McCarthy

For Contribution - Federal Account

#010154# :054000522: 025101241#

TUDOR MANOR PARTNERSHIP
35 GLENDALE ST.
DEL AIR, MD 21014

525

11-7 19 88

PAY TO THE ORDER OF C.C.R.C.F.A.-88 $ 2,000.00

TWO THOUSAND DOLLS 00 CTS ---------- DOLLARS

[redacted]
Bank of Maryland
Federal Reserve District

Paul Fund Raiser

#000525# :055002299: 01008704

SIGNET BANK

7578

11/1 19 88

PAY TO THE ORDER OF C.C.R.C.F.A.-88 $ 500.00

FIVE HUNDRED DOLLS 00 CTS ---------- DOLLARS

#007578# :052000161: 343-8207957#

---

9 1 0 4 0 3 1 1 4 6 0

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1918

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 10-29 19 88

		DOLLARS	CENTS
CURRENCY		152	—
COINS		0	50
CHECKS (List Separately)			
61-7245		6	—
61-66		10	—
61-40		6	—
61-7158	✓	1000	—
61-256	✓	100	—
7-16	✓	200	—
7-89	✓	200	—
7-1	✓	1000	—
61-224	✓	1000	—
SUB TOTAL		4114	50
TOTAL FROM OTHER SIDE			
TOTAL DEPOSIT ▶	4114		50

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution

DUPLICATE

:055000615: 1070106 2"

2 0 0 4 0 3 1 1 4 6 1

P 0004081 1 4562

GORDON L. SMITH
BARBARA SMITH
13711 EAST DEVONFIELD DRIVE
BALDWIN, MARYLAND 21013

3848

October 21 19 88

PAY TO THE ORDER OF Victory '88 $ 200.00

Two Hundred and 00/100 DOLLARS

Equitable Equitable Bank, N.A.

FOR Contribution

:052000896: 3848 798 0088 7#

SIGNET BANK

2759

Oct. 24 19 88

PAY TO THE ORDER OF Victory '88 $ 1,000.00

One thousand and 00/100 DOLLARS

FOR

#002759# :052000016: #306-07956#

900400811463

JOHN B. BURCHAM, JR.
8821 NASHVILLE ROAD
LANHAM, MD 20706

750

October 24, 1988

PAY TO THE ORDER OF CCRCFA-88 $ 1000.00

One thousand and no/100 DOLLARS

CHEVY CHASE®
A FEDERAL SAVINGS BANK

FOR

John B. Burcham, Jr.

:255071981: 1633068L 0750

W. DALE HESS
MARIE R. HESS
FALLSTON, MD 21047

6200

10/26 1988

PAY TO THE ORDER OF C.C.R.C. FA-88 $ 1,000.00

One Thousand DOLLARS

MT. AIR OFFICE
THE FOREST HILL STATE BANK
FOREST HILL, MARYLAND

FOR

W. Dale Hess

⑈0006200⑈ :055002286: 0000264150⑈

WILLIAM R. ROTHE
GAY FREDERICK ROTHE
4609 TUNLAW ROAD, N. W., NO. 607
WASHINGTON, D.C. 20007

2825

10/23/88

PAY TO THE ORDER OF "VICTORY '88" $ 200.00

Two Hundred + NO/100 DOLLARS

MARYLAND NATIONAL BANK

FOR

:052000168: 2825 00 16240814⑈

JAYNE H. PLANK

153

10/ 88

PAY TO THE ORDER OF ES Victory 88 $ 100.00

Two Hundred + 00/100 DOLLARS

COMMUNITY BANK OF MARYLAND
RIVERDALE, MD 20737

1000 Parkland Rd

:055002969: 1551 0000-0153

Washington DC 20016

DEPOSIT TICKET

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2180
WESTMINSTER, MD 21157

DATE 11-2 19 88

CASH		
CHECKS	741	1000 00
TOTAL FROM OTHER SIDE		
TOTAL	1000	00

[redacted]

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

Union National Bank
WESTMINSTER, MARYLAND 21157

⑈001858⑈ ⑆055000615⑆ ⑈1070105 2⑈

BENTLY RE-ELECT COMMITTEE INC. 88
P. O. BOX 10510
TOWSON, MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 1000 00

One Thousand 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
2ND YORK ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093

FOR Check from Franklin Perdue Dpsit in error Margaret E. Mullen

⑈0000 1078⑈ ⑆052000618⑆ ⑈6 25729⑈

900408114654

PLEASE ENDORSE ALL CHECKS
DEPOSITED

SERVING OUR COMMUNITY SINCE 1818

MEMBER NATIONAL BANK

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 10-2 19 88

		DOLLARS	CENTS
CURRENCY			
COINS			
CHECKS (List Separately)			
[illegible]		[illegible]	
7-16	✓	1000	—
1-12	✓	1000	—
7-16	✓	1000	—
65-77	✓	1000	—
15-52	✓	1000	—
65-296	✓	100	—
61-234	✓	100	—
12-40	✓	210	—
61-40	✓	115	—
7-1/820	✓	200	—
7-16	✓	200	—
67-1	✓	100	—
7-16	✓	100	—
61-316	✓	1030	—
61-223	✓	100	—
1-61	✓	1000	—
SUB TOTAL		8300	—
TOTAL FROM OTHER SIDE			
TOTAL DEPOSIT ➤		8300	—

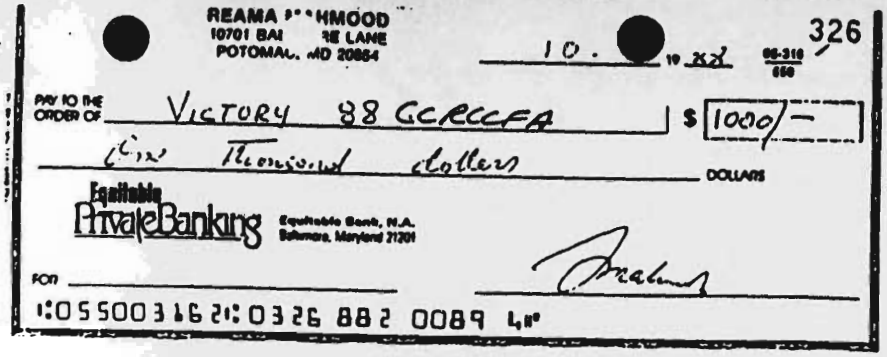
This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

RECORDER • LLC • 4DP8

DUPLICATE

:055000615: 2907010820

0004031114655



REAMA [illegible]HMOOD
10701 BAI [illegible]E LANE
POTOMAC, MD 20854

10- 19 88 326

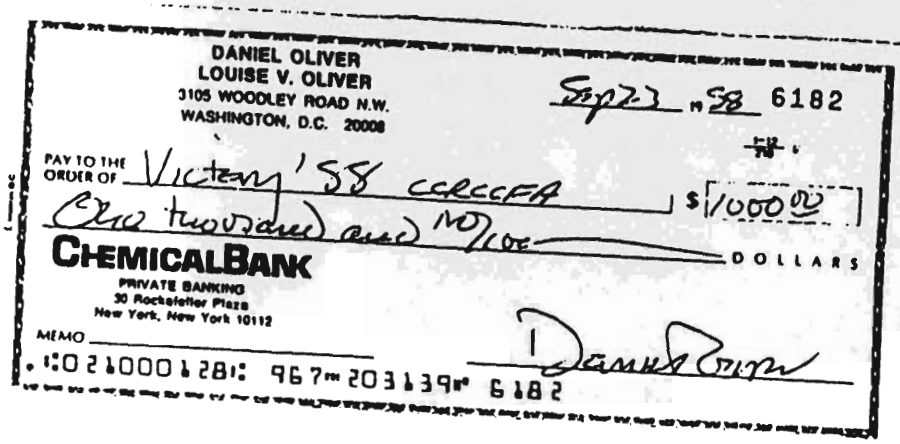
PAY TO THE ORDER OF Victory 88 CCRCCFA $ 1000/-

One Thousand dollars DOLLARS

Equitable PrivateBanking Equitable Bank, N.A. Baltimore, Maryland 21201

FOR

:055003162: 0326 882 0089 4#



DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 88 6182

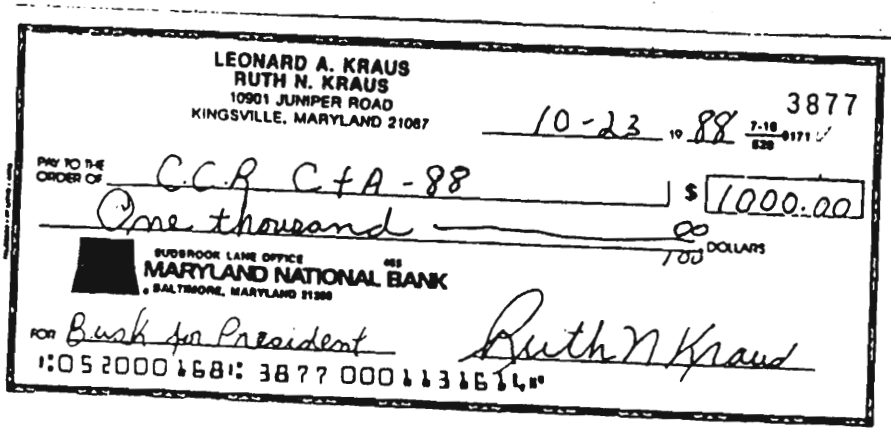
PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000 00

One thousand and NO/100 DOLLARS

CHEMICALBANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO

:021000128: 967m 203139#* 6182



LEONARD A. KRAUS
RUTH N. KRAUS
10901 JUNIPER ROAD
KINGSVILLE, MARYLAND 21087

10-23 19 88 3877

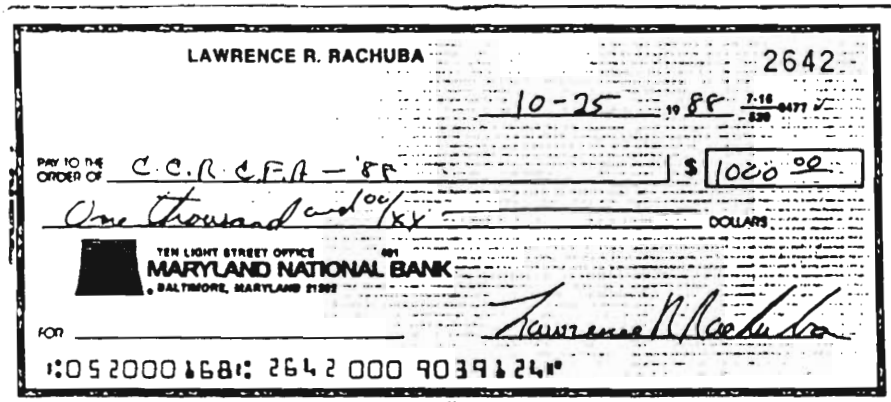
PAY TO THE ORDER OF C.C.R C+A-88 $ 1000.00

One thousand 00/100 DOLLARS

SUDBROOK LANE OFFICE
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21208

FOR Bush for President Ruth N Kraus

:052000168: 3877 000116164#



LAWRENCE R. RACHUBA

2642

10-25 19 88

PAY TO THE ORDER OF C.C.R C.F.A - '88 $ 1000 00

One Thousand and 00/xx DOLLARS

TEN LIGHT STREET OFFICE
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR

Lawrence R Rachuba

:052000168: 2642 000 90391 24#

P0004031146 6

811

LEONARD L. ABEL
JUNE K. AT
407 SCOTT DR.
SILVER SPRING, MD 20904

September 24 19 88 05-222/550 01 ✓ 02

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100.

One Hundred 00/100 DOLLARS

Montgomery National Bank

FOR _____

L. Abel

⑈000817⑈ ⑆055002231⑆ ⑈01⑉007335⑉06⑈

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10-7 19 88 05-60/531 ✓

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 150.00

one hundred fifty 00/100 DOLLARS

First National Bank of Maryland
LUTHERVILLE, MARYLAND ACCOUNTING CENTER

FOR _____

James P. Goldsmith

⑆052100408⑆ 059⑉0270 8⑈ 1933

AMERICAN EXPRESS MONEY ORDER

Pentagon Federal Credit Union 04-388,304,036
Box 1432 — Arlington, Virginia 22313

PAY THE SUM OF
NOT GOOD OVER $1,000

THE SUM 250 DOLS 00 CENTS

DATE Oct 27 19 88

PAY TO THE ORDER OF CCRCFA 88

SENDER'S NAME AND ADDRESS Jean M Shannon 5811 Holton Ln Temple Hills, Md

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 ⑉388304036⑆

ANDREW MANOS
6905 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

OCT 10 1988

5231

10-15- 19 88 S 05-234/560 ✓

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

One Hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR _____

Andrew Manos

⑆055002341⑆ 42 1242 2⑈ 5231

2004081467

BETHESDA, MARYLAND 20816

10/15 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

ONE HUNDRED AND NO/100 DOLLARS

Citizens Bank Of Maryland

MEMO

:055002969: 280 2804 500 2369

ANN McLAUGHLIN
2016 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 1988

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

Ann McLaughlin

:054000522: 0 24924 926 92765

PARVEZ SHAH, M.D. 6-88
BIRJEES SHAH
4405 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 1988

Pay to the Order of Victory 88 CCRCCFA $ 1,000.00

One thousand 00/100 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

:055000770: 1272 000294066

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL 301-730-6943
11380 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11 1988 7-16/520 1276

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 1000 00

One thousand —/100 DOLLARS

COLUMBIA OFFICE 001
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Election contribution Bank

:052000168: 0735 00 7894 7108

---

2 0 0 4 0 3 1 1 4 6 8

BALTIMORE, MD 21210

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100.00

One Hundred and 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO

⑆052000168⑆0190⑈000 11378⑈

ROBERT B. OR MARGARET K. BARNHILL
6907 WEYMOUTH COURT PH 301-377-6652
BALTIMORE, MD 21212

1811

10-1 1988

Pay to the Order of Victory 88 CCRCCFA $ 100.00

One hundred Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For

⑆053200191⑆18117⑈32 150057⑈

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88

PAY TO THE ORDER OF Victory 88 ccrccfa $ 200.00

two hundred and 00 cnts DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR Suck for president

⑆052000168⑆ 055100 0 103925⑈

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

⑆052000161⑆ ⑈301⑈57630⑈ 0631

>0004031114569

COMMITTEE INC. 88
P. O. BOX 10819
TOWSON, MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88

One Thousand $ 1,000 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
2020 YORK ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093 04

FOR Check from Franklin Perdue Deposit in error

Margaret E. Mullen

⑈0000 1078⑈ ⑆052000618⑆ ⑈625729⑈

>1340311470

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN [redacted]

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1810

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-4 19 88

	DOLLARS	CENTS
CURRENCY	12	—
COINS		
CHECKS (List Separately)		
65-62	36	—
SUB TOTAL	48	—
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	48	—

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • KLC • KORB

:0550009151: 1902708208 2"

DUPLICATE

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN [redacted]

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1810

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 11-9 19 88

	DOLLARS	CENTS
CURRENCY	40	—
COINS		
CHECKS (List Separately)		
65-7675	6	—
65-77	10	—
65-62	25	—
SUB TOTAL	86	—
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	86	—

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • KLC • KORB

:0550009151: 1902708208 2"

DUPLICATE

42200

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1816

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 1-17 19 88

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
7-16	150	23
SUB TOTAL		
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	150	23

This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • ILC • RDRB

:051900055O:

:2907O9O6:

DUPLICATE

42200

PLEASE ENDORSE ALL CHECKS
DEPOSITED IN

UNION NATIONAL BANK

SERVING OUR COMMUNITY SINCE 1816

Union National Bank

WESTMINSTER, MARYLAND 21157

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE-FEDERAL ACCT.

Date 2-21 19 88

	DOLLARS	CENTS
CURRENCY		
COINS		
CHECKS (List Separately)		
7-1	577	72
SUB TOTAL		
TOTAL FROM OTHER SIDE		
TOTAL DEPOSIT ➤	577	72

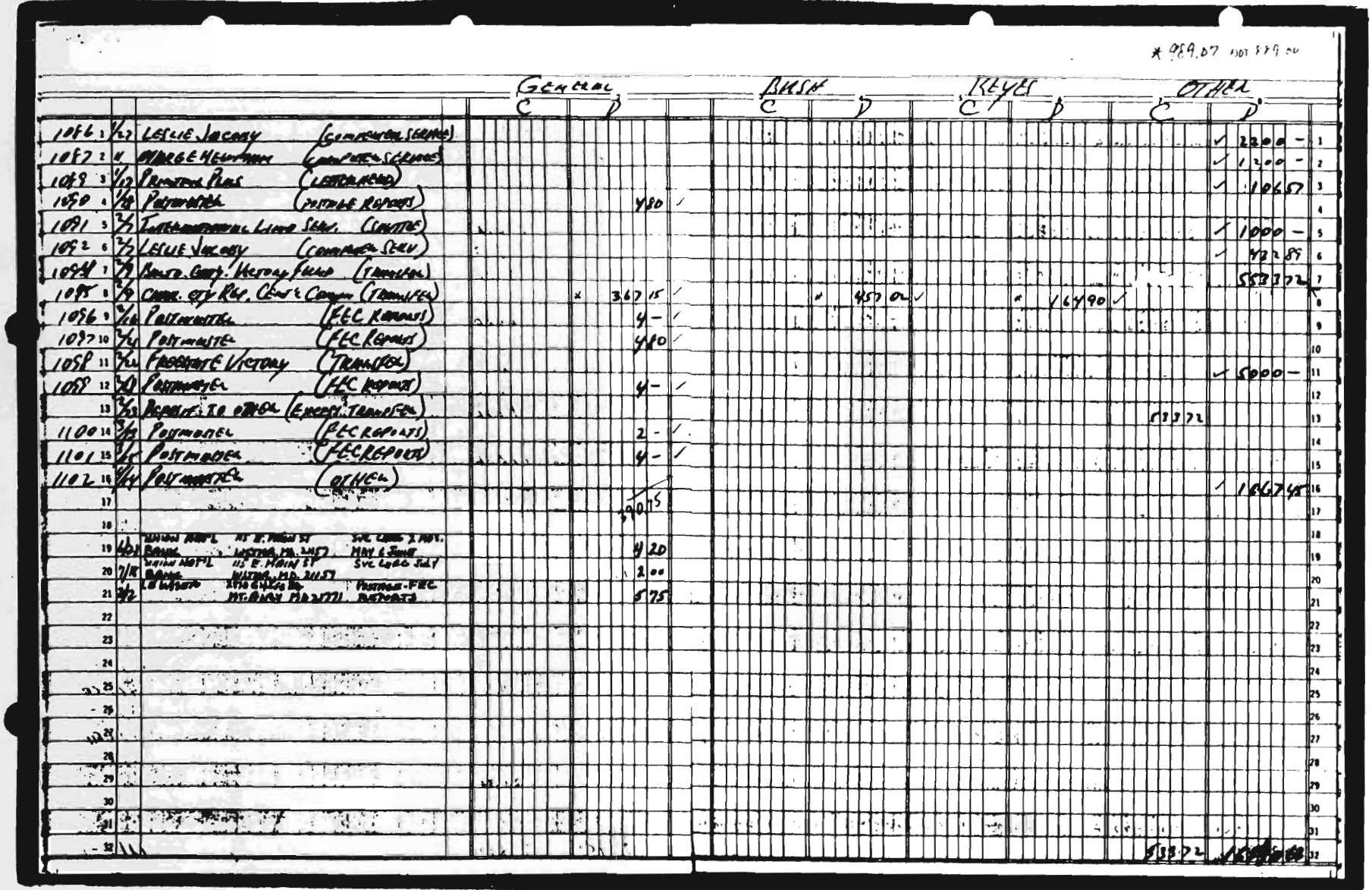
This deposit is accepted subject to verification, the provisions of the uniform commercial code, and rules and regulations of this financial institution.

FALCONER • ILC • RDRB

:051900055O:

:2907O9O6:

DUPLICATE



* 959.07 not 579.00

				GENERAL C	GENERAL D	BUSH C	BUSH D	REYES C	REYES D	OTHER C	OTHER D	
1086	1	1/27	LESLIE JACOBY	(COMMISSION SERVICE)							✓ 2200 —	1
1087	2	〃	GEORGE HEIDEMANN	(COMPUTER SERVICES)							✓ 1200 —	2
1089	3	1/27	PRINTED PAGE	(LETTERHEAD)							✓ 10657	3
1090	4	1/28	POSTMASTER	(POSTAGE REPORTS)		480 ✓						4
1091	5	2/1	INTERNATIONAL LIGHT SERV.	(CHARTER)							✓ 1000 —	5
1092	6	2/1	LESLIE JACOBY	(COMMISSION SERV)							✓ 412 85	6
1094	7	2/1	BOOTH COMP. HISTORY FILMS	(TRANSFER)							55372	7
1095	8	2/1	CHRIS. CITY REP. CENT. COMM	(TRANSFER)		× 367 15 ✓		〃 457 00 ✓	〃 164 90 ✓			8
1096	9	2/14	POSTMASTER	(FEC REPORTS)		4 — ✓						9
1097	10	2/14	POSTMASTER	(FEC REPORTS)		480 ✓						10
1098	11	2/14	FREEDOM'S VICTORY	(TRANSFER)							✓ 5000 —	11
1099	12	2/21	POSTMASTER	(FEC REPORT)		4 — ✓						12
	13	2/25	REPAYMENT TO OTHER	(EXCESS TRANSFER)						55372		13
1100	14	2/25	POSTMASTER	(FEC REPORTS)		2 — ✓						14
1101	15	2/26	POSTMASTER	(FEC REPORT)		4 — ✓						15
1102	16	2/27	POSTMASTER	(OFFICE)							✓ 16674 48	16
	17					390 15						17
	18											18
	19	4/21	UNION HOTEL BOOK	112 E. MAIN ST LESTER, PA. 19113	SVC. CHRG & MISC. MAY & JUNE							19
	20	7/18	UNION HOTEL BOOK	112 E. MAIN ST WILTON, MD. 21157	SVC. CHRG JULY	4 20						20
	21	3/2	L.B. WILSON	1710 CHRIS BL MT. RIDGE PA 17711	POSTAGE-FEC REPORTS	2 00						21
	22					5 75						22
	23											23
	24											24
	25											25
	26											26
	27											27
	28											28
	29											29
	30											30
	31											31
	32									55372	[illegible]	32

240311473

P 0 0 4 0 3 1 1 4 7 4

12730.00
12882.00

				GRAHAM C	GRAHAM P	BUSH C	BUSH P	KEYES C	KEYES P	OTHER C	OTHER P	
570 1	10/18	GERALD SOMMER	11/18					6 -				1
2	"	CASH	"					150 -				2
3845 3	"	GORDON SMITH	"							100 -		3
1528 4	"	WILLIAM ROTHE	"							200 -		4
153 5	"	WAYNE PLUNK ✓	"				1			500 -		5
750 6	"	JOHN BURCHAM, JR. ✓	"							1000 -		6
200 7	"	W. DALE HALL ✓	"							1000 -		7
35 8	10/18	HARRY ROSENBERG, JR. ✓	"							1000 -		8
326 9	11/2	TARLA MAHMOOD, MD ✓	"							1000 -		9
1812 10	"	PATRICK OLIVER	"							1000 -		10
3877 11	"	RUTH KRAUS ✓	"							1000 -		11
1647 12	"	CHURCHILL RICHMAN ✓	"							1000 -		12
2365 13	"	PETER ZOURDOS	"				1			1000 -		13
2765 14	"	ANN MCLAUGHLIN ✓	"							1000 -		14
1272 15	"	PARKER SHAW, MD ✓	"							1000 -		15
0735 16	"	SHAUKAT ASHAI ✓	"							1000 -		16
817 17	"	JAMES HOEL	"							100 -		17
1933 18	"	JAMES GOLDSMITH	"							150 -		18
money order 19	"	JOHN SHANNON ✓	"							250 -		19
5231 20	"	RINDER MARKS	"							100 -		20
0180 21	"	KENNETH BURKE	"							100 -		21
1811 22	"	ROBERT BARNHILL	"							100 -		22
551 23	"	JOSEPH PAYNE	12							200 -		23
631 24	11/2	JOHN FOSTER	"							200 -		24
1063 25	11/2	SHIRLEY HORNBERGER PAC	"				200 -					25
1064 26	11/1	WTTR MRI	"				325 -					26
27	11/8	CASH	11/8			1/2 -						27
1138 28	"	JERRY BARNES	11/8		36 -							28
1078 29	11/2	BENTLEY RE-ELECTION COMMITTEE	11/2							1000 -		29
126 30	11/8	LARRY SHIPLEY	"			6 -						30
31	11/8	CASH	11/8			5 -						31
32					36 -	23 -	529 -	156 -		12200 -		32

5854.95 606284

				GREEN		BUSH		KEYES		OTHER		1168
				C	D	C	D	C	D	C	D	
09171	11/3	Gordon Olson	ag			25-						1
3184	2	Roger Chamberlain	"			10-						2
case	3	Joe Francis	D			40-						3
1065	4	11/4 Wolf's Bakery	Election Pay				24-					4
1070	5	11/4 Kennedy Knott + Kortkamp	Victory Party				17 00					5
1071	6	11/4 Frank Rowland	Victory Party				11 93					6
1072	7	11/4 Betty Cheney	Victory Party				32 86					7
1073	8	11/3 Bonney Re-Election Committee									100 00	8
1065	9	11/4 Hanel	Quapaw Route				69 80					9
1066	10	11/4 C.C Ford	Quapaw Route				72 21					10
1067	11	11/4 Carson	Quapaw Route				6 81					11
1068	12	11/4 Kenneth Hennessee	Quapaw Route				75 20					12
1074	13	11/3 Commercial Printing	Headquarters				1 22					13
1075	14	11/3 Greg Cheney	Photos				2 56					14
1076	15	11/3 Coca Cola	AD				1 16					15
1077	16	11/3 Scott B. Inskeep	Photos	Pd							168-	16
M154	17	11/4 Dawn Publishing Co								50 00 -		17
5858	18	" Tupa Insurance Partnership								40 00 -		18
7678	19	11/4 Ronald Ascelli, Jr.								5 00 -		19
	20	11/3 MP Victory '82	Reimbursement Campaign Funds			319 52						20
1077	21	11/3 Postmaster			44 48							21
1079	22	11/1 Rep Central Comm.	Transfer		500-							22
1080	23	11/2 Robert Kelly	Mileage		62 16							23
1081	24	11/4 Eureka Blue Gazette									201 48	24
1082	25	11/4 Mammoth Lumber Service									460 56	25
1083	26	11/3 Postmaster									375-	26
1084	27	11/4 Raymond Vest									17 69	27
1085	28	11/4 International Lumber Serv									500-	28
1086	29	11/4 Postmaster					21 30					29
09726	30	11/1 CTP	(Refund)		100 25							30
	31											31
	32				190 28		56 856	294 52		74 897	7500-	4693 09 32

9 0 4 0 8 1 1 4 7 5

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1073

65-61/550

November 7 19 88

PAY TO THE ORDER OF Bentley Re-Elect Committee, Inc. $ 1,000.00

One Thousand Dollars 00/100 DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR

Gary M. Bentley

⑈001073⑈ ⑆055000651⑆ ⑈0701062⑈ ⑈0000100000⑈

Blumberg No. 8116
EXHIBIT
111

FOR DEPOSIT ONLY
BENTLEY, RE ELECT COMMITTEE

NOV 88

Trust Co.

Deposit

Pay to the Order of

Dollars

For

Unauthorized

Void after 180 days

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL AC[redacted]
P.O. BOX 2108
WESTMINSTER, MD - 21157

1077

Nov. 15 19 88 65-81/550

PAY TO THE ORDER OF Scott B. Marks 11-25-88-004 02 0560 $ 168.00

One Hundred Sixty-eight ---------- NOV 28 1988 00/100 DOLLARS

PAID

THE UNION NATIONAL BANK
WESTMINSTER, MARYLAND

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

photo (other) [redacted]

"001077" "055000615" [redacted] "0070106 2" "000016800"

564134

Customer's Order No. _____ DATE Nov 15. 19 88

SOLD TO Victory 88

ADDRESS 2323 York Rd.

SALESMAN _____ TERMS _____

CASH	CHARGE	C.O.D.	PAID OUT	RETD. MDSE.	CREDIT	RECD. ON ACCT.

QUAN.	DESCRIPTION	PRICE	AMOUNT
42	8X10" B/W Photos @ $4.00 ea 6 1/2 [redacted]		168 00
	[redacted]		
	Scott B. Marks		
	1908 Stanhope		
	Baltimore, Md. 21222		
	Total		168 00

ALL Claims and Returned Goods MUST Be Accompanied By This Bill.

SIGNATURE Scott B. Marks

REDIFORM 01588/5H588

2 0 4 0 3 1 1 4 7 8

Patricia Marks
1422207

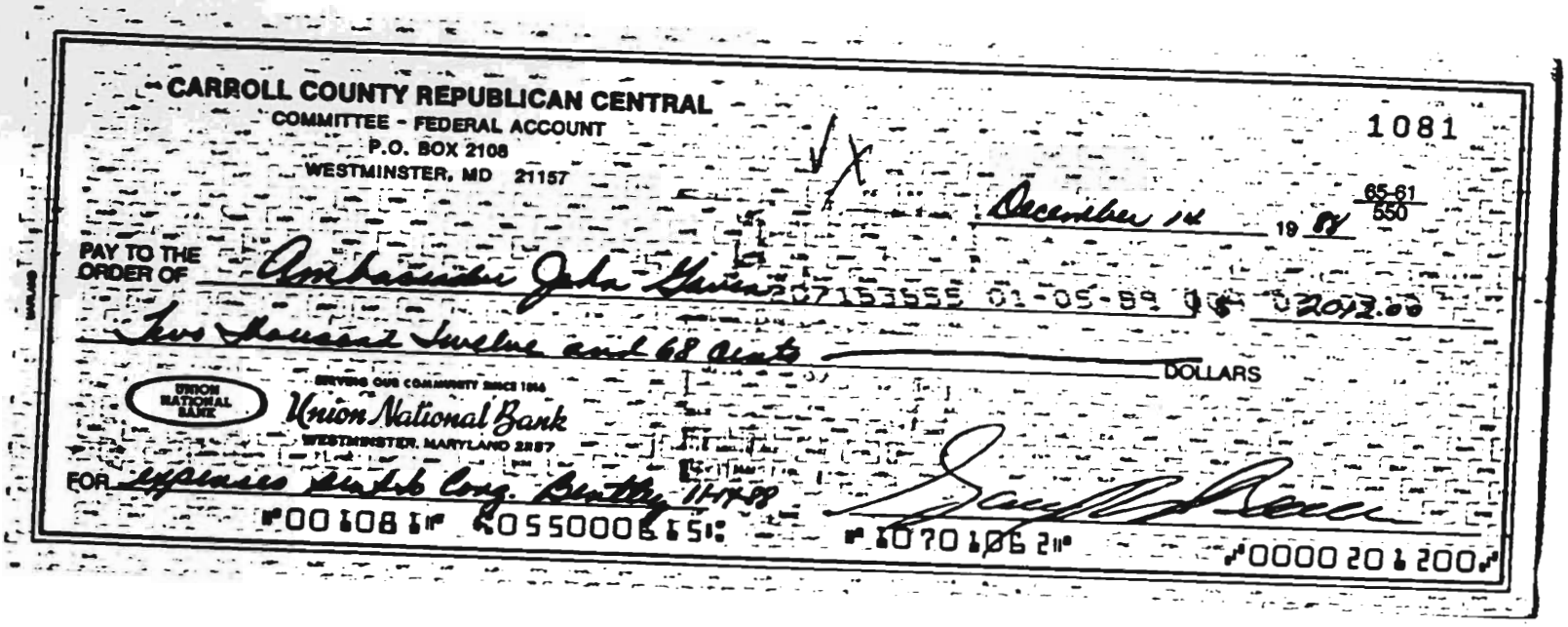
92 3 6 5 5

THE BANK OF BALTIMORE
205 W. Centre St.
Baltimore, MD
(301) 783-5588
A 052001962

NDV 8.8

BANK OF BALTIMORE GROUP
21-45 1422207 BANK #
0616007761 123-68

0000403114779



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1081

65-61
550

December 14 19 88

PAY TO THE ORDER OF Ambassador John Glenn 07153555 01-05-89 $ 02012.68

Two thousand twelve and 68 cents DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1864
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR Expenses Dist 6 Cong. Seattle 11+88

⑈001081⑈ ⑆055000651⑆ ⑈0701062⑈ ⑈0000201200⑈

9 0 4 0 8 1 1 4 8 0

9 0 0 4 0 3 1 1 4 3 1

JOHN GAVIN

VIA FACSIMILE

14 November 1988

Congresswoman Helen Bentley
1610 Longworth Office Building
Washington, D.C. 20515

Dear Congresswoman Bentley, John

The following is a breakdown of the expenses incurred by Ambassador and Mrs. Gavin on their trip to Washington. The totals are as follows:

Airline Transportation	$1,712.00 ✓
Limousine Transportation	$460.50 all attached paid already
Lodging	$300.68 ✓
	$2473.18

If I can answer any questions, please feel free to contact me at 213-552-6650.

Sincerely,

Silvia Hemingway /trj

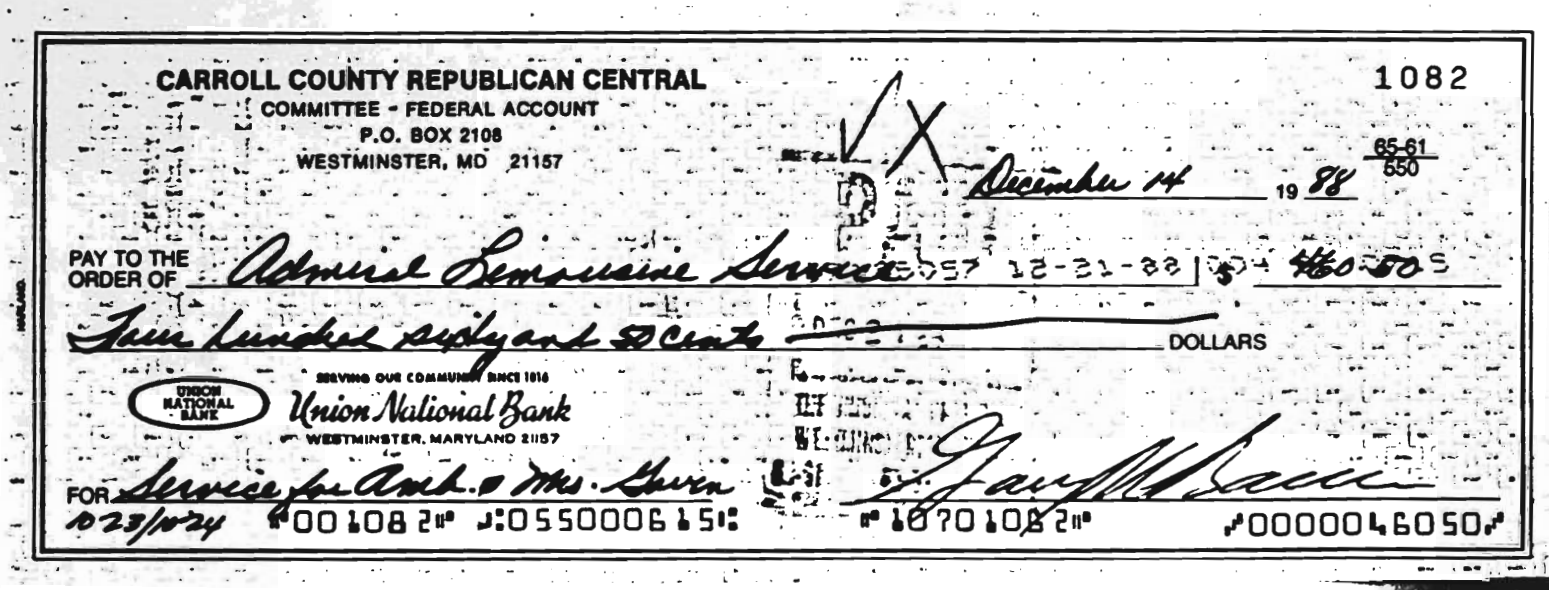
Silvia R. Hemingway
Assistant to Ambassador Gavin

SRH/trj

2121 Ave of the Stars
Suite 3300
Los Ang. Calif 90067

pd 12-14-88 #1081 $ 1712.00 + 300.68 = 2012.68

DEC 9 '88 15:39



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1082

December 14 19 88

65-61
550

PAY TO THE ORDER OF Admiral Limousine Service $ 460.00

Four hundred sixty and 00 Cents DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR Service for Asst. & Mrs. Laura

023/024 ⑈001082⑈ ⑆055000615⑆ ⑈1070108211⑈ ⑈0000046050⑈

70040811433

PAY TO THE ORDER OF
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VA 22101
FOR DEPOSIT ONLY
ADMIRAL LIMOUSINE SERVICE
OFFICE ACCOUNT

DEC 21 88

DE 88 20

0560
1:0424

FIRST AMERICAN B
MCLEAN VA 22

0220-0220-0220-

Admiral Limousine Service

1104 PRINCESS STREET • ALEXANDRIA, VIRGINIA 22314
Telephone (202) 554-1000 (24 Hours)
Accounting Department (703) 548-4382

271

October 25, 1988

UNIVISA SATELLITE COMMUNICATIONS
9200 Sunet Boulevard
Suite #824
Los Angeles, California 90069
Attention: Mr. Togg Johnson

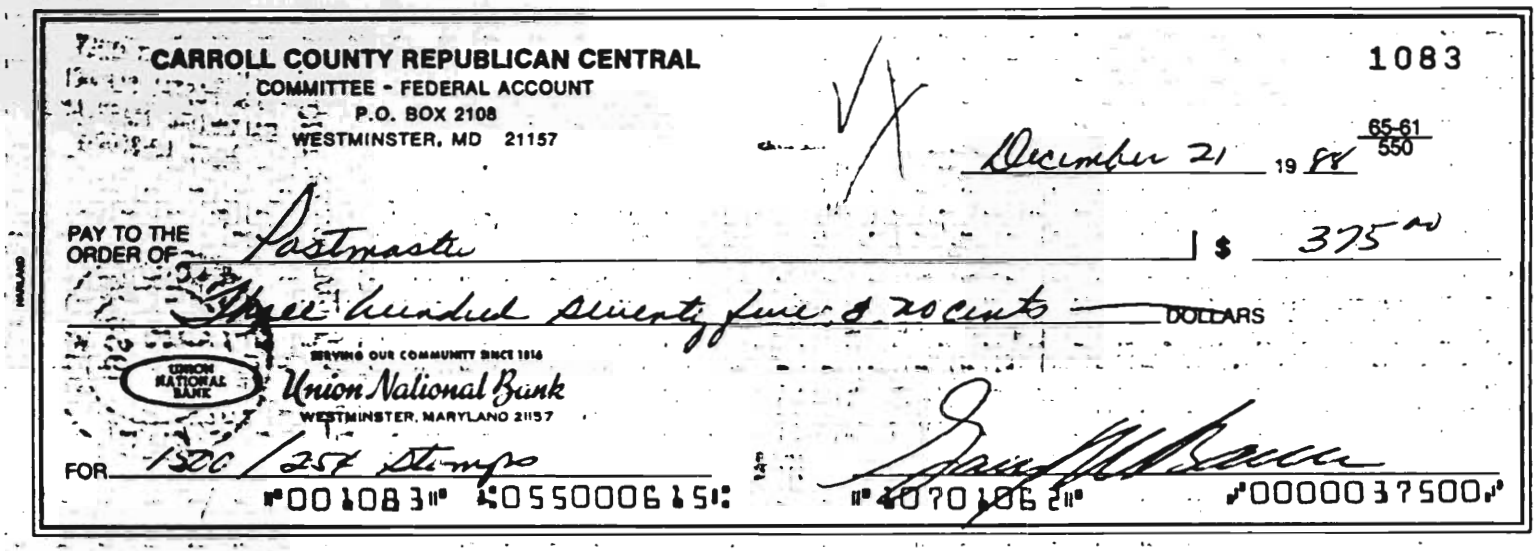
SERVICE FOR AMBASSADOR AND MRS. GAVIN

10/23/88	(1) Limousine 12:00 Noon to one way only.	(WNA)	$ 60.00
10/23/88	(1) Limousine 5:45 p.m. until 10:30 p.m.		225.00
10/24/88	(1) Limousine 8:00 a.m. to one way only.	(Dulles)	90.00
	Subtotal		$ 375.00
	15%		56.25
	7%		26.25
	Parking		3.00
	TOTAL		$ 460.50

pay due

PAYMENT DUE UPON RECEIPT—ENCLOSE PINK COPY WITH PAYMENT

11-14-88
Sent copy directly to Congresswoman Bentley to be paid in full pd Ck# 1882 12-14-88



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1083

65-61
550

December 21 19 88

PAY TO THE ORDER OF Postmaster $ 375^{00}

Three hundred seventy five & 00 cents DOLLARS

SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR 1500 / 25¢ Stamps

⑈001083⑈ ⑆055000615⑆ ⑈4070106 2⑈ ⑈000037500⑈

900408114 36

DEC 27 88

0520-0011-3

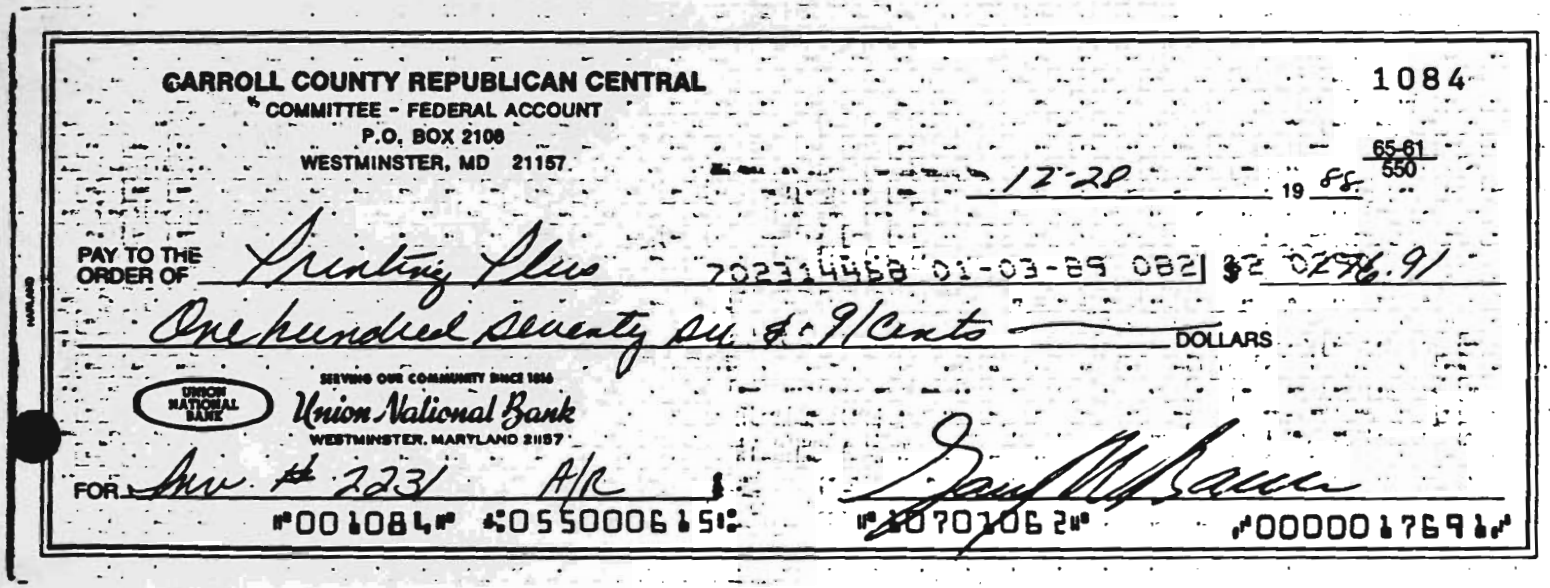
FNB OF MD
110 South Pace Street
Tel. No. 301-347-6183
Baltimore, MD

POSTAL CUSTOMER KNOWN

FOR DEPOSIT ONLY
U.S. POSTAL SERVICE
BALTIMORE, MARYLAND
ACCT. 62-8004

BALTIMORE, MD
DEC 23 1988
USPS

P 0 0 4 0 8 1 1 4 3 7



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2106
WESTMINSTER, MD 21157

1084

65-61
550

12-28 19 88

PAY TO THE ORDER OF Printing Plus 702314468 01-03-89 082 $2 0296.91

One hundred seventy six & 91/Cents DOLLARS

SERVING OUR COMMUNITY SINCE 1866
UNION NATIONAL BANK
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR Inv # 223 A/R

⑈001084⑈ ⑆055000615⑆ ⑈0070106 2⑈ ⑈00000176 9⑈

9 0 0 4 0 3 1 1 4 3 3

PRINTING PLUS
FOR DEPOSIT ONLY

0 0 1 2 1 7

PROVIDENT BANK OF MD
P.
P. JAN 3 1989 E.
E.
G. LT 263 33 G.

PAY ANY BANK 27-6
027-6 01-03-89
02314468

R JA 89 03 P.
E. PROVIDENT BK OF MD E.
G. PAY ANY BANK G.

0 0 0 4 0 3 1 1 4 3 9

JOB ORDER & INVOICE

№ 2231

PRINTING PLUS...

1840C York Road, Timonium, Maryland 21093 (301) 561-9595

COMPANY/NAME Helen Bentley c/o Victory 88

NAME PHONE 337-7222

DATE OF ORDER	PRINT DATE	DATE DELIVERED	CUSTOMER P.O. #	ORDERED BY:	RESALE NO
12-13-88		12-16-88			

PLACE SPECIAL INSTRUCTION STICKER HERE

PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	SIZE 8½ x 11	SIZE 8½ x 14	SIZE 11 x 17	SIZE OTHER	PAPER 20# BOND	PAPER RAG BOND	PAPER COVER STOCK	PAPER CARD STOCK	PAPER CUST STOCK	PAPER CARBON LESS	PAPER OTHER	PAPER COLOR WHITE	PAPER COLOR OTHER	PAPER COLOR BLACK	PAPER COLOR OTHER	AMOUNT
		1500		X		X					X						X				105.49

JOB DESCRIPTION: Reflex Blue

SPECIAL INSTRUCTIONS:

PLACE SPECIAL INSTRUCTION STICKER HERE

INSTANT PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	SIZE 8½ x 11	SIZE 8½ x 14	SIZE 11 x 17	SIZE OTHER	PAPER 20# BOND	PAPER RAG BOND	PAPER COVER STOCK	PAPER CARD STOCK	PAPER CUST STOCK	PAPER CARBON LESS	PAPER OTHER	PAPER COLOR WHITE	PAPER COLOR OTHER	PAPER COLOR BLACK	PAPER COLOR OTHER	AMOUNT

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

Pd 12-29-88
Ck # 1084

PLACE SPECIAL INSTRUCTION STICKER HERE

QUICK PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	SIZE 8½ x 11	SIZE 8½ x 14	SIZE 11 x 17	SIZE OTHER	PAPER 20# BOND	PAPER RAG BOND	PAPER COVER STOCK	PAPER CARD STOCK	PAPER CUST STOCK	PAPER CARBON LESS	PAPER OTHER	PAPER COLOR WHITE	PAPER COLOR OTHER	PAPER COLOR BLACK	PAPER COLOR OTHER	AMOUNT

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

PLACE SPECIAL INSTRUCTION STICKER HERE

SPECIALTY PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	SIZE 8½ x 11	SIZE 8½ x 14	SIZE 11 x 17	SIZE OTHER	PAPER 20# BOND	PAPER RAG BOND	PAPER COVER STOCK	PAPER CARD STOCK	PAPER CUST STOCK	PAPER CARBON LESS	PAPER OTHER	PAPER COLOR WHITE	PAPER COLOR OTHER	PAPER COLOR BLACK	PAPER COLOR OTHER	AMOUNT

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

PRINTING PREPARATION

TYPE 20.—	NEGS.	Strip	Score/Perf	Drill	GBC/Velo
REV.	H/T	Plates 15—	Fold	#'s	Handtime
Stats	Screen	Stock	Pad	Staple	w/u 18.—
Paste-Up 10.—	DX's	Cut	Coll	Booklet	

PLACE SPECIAL INSTRUCTION STICKER HERE

☐ CUSTOMER PICKED-UP ART ☐ CALL CUSTOMER WHEN ORDER IS COMPLETED

☐ PRESSPERSON RETURN ART TO JOB SLEEVE _____ P.P. INITIAL

ORDER RECEIVED BY

p/ M J Neuman

PLEASE PAY FROM THIS INVOICE

PRINTING PLUS' CASH & CARRY POLICY ELIMINATES A CREDIT DEPARTMENT, BOOKKEEPING, AND COLLECTION EXPENSES. WE OPERATE IN THIS MANNER

PROOF-AFFADAVIT

We have read this proof through carefully for spelling of names, addresses, telephone numbers, dates, prices, etc. Our O.K. relieves Printing Plus of all responsibility and indicates that we have received the proof, carefully examined it, and it is entirely satisfactory. You are now authorized to proceed with the printing.

OK AS IS ☐ OK WITH Corrections ☐

By _____

NO PROOF RELEASE: I hereby authorize Printing Plus to print my

PAYMENT RECEIVED BY

CASH _____

CHECK # _____

CHARGED:

MASTER CARD/VISA

_____

_____

TYPE/ART	
PRINTING	
PASTE-UP	
BINDERY	
	105.49
OTHER SERVICES	63.—
SUB-TOTAL	168.49
SALES TAX	8.42
TOTAL	176.91
DEPOSIT	

P00408114?1

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1085

65-61/550

December 29 19 88

PAY TO THE ORDER OF International Long Distance 03-DE-89 $ 500.00

Five hundred and no cents DOLLARS

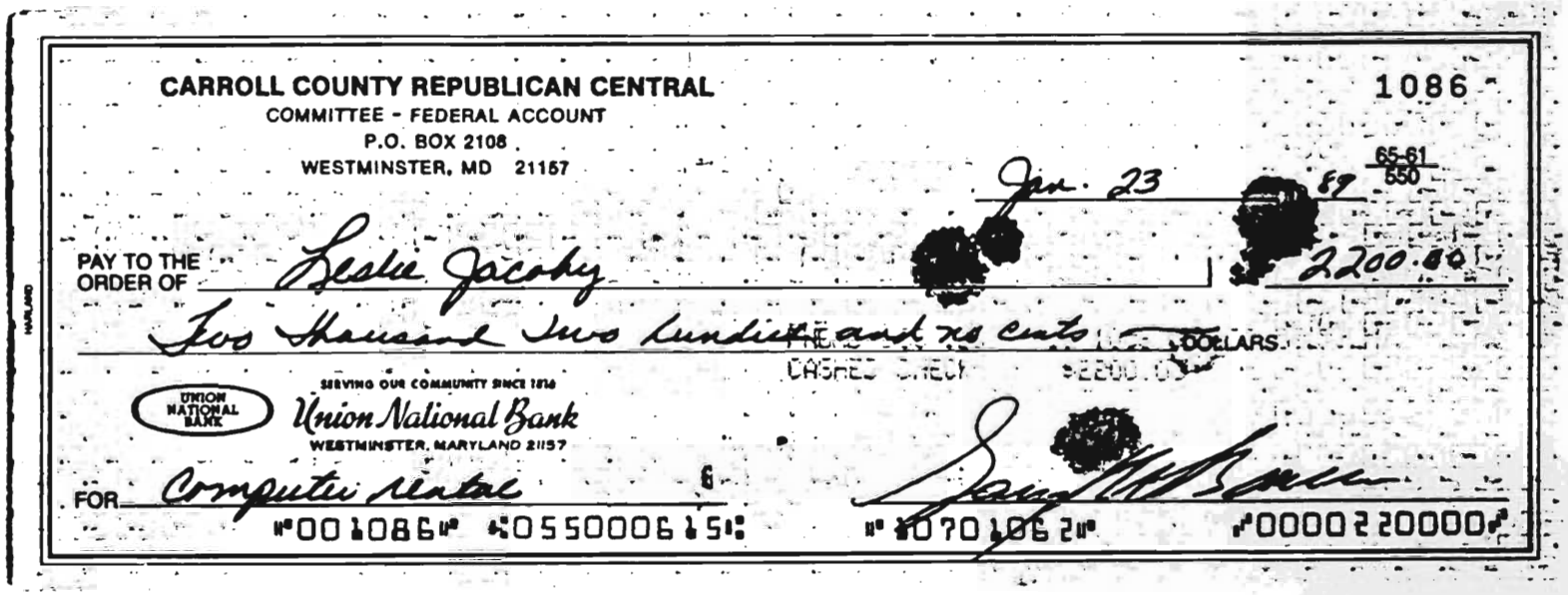
SERVING OUR COMMUNITY SINCE 1816
UNION NATIONAL BANK
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR

⑈001085⑈ ⑆055000615⑆ ⑈0070106?⑈ ⑈0000050000⑈

P00401114922

9 0 0 4 0 3 1 1 4 9 3



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1086

65-61
550

Jan. 23 89

PAY TO THE ORDER OF Leslie Jacoby $ 2200.00

Two thousand two hundred and no cents DOLLARS

CASHED CHECK $2200.00

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1876
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR Computer rental

David M. Brown

⑈001086⑈ ⑆055000615⑆ ⑈0701062⑈ ⑈0000220000⑈

2 3 3 4 0 3 1 1 4 3 9 4

9 0 0 4 0 3 1 1 4 9 5

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1087

65-61
550

Jan. 23 19 87

PAY TO THE ORDER OF Marjorie Herman $ 1200.00

One thousand two hundred and 00 cents DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

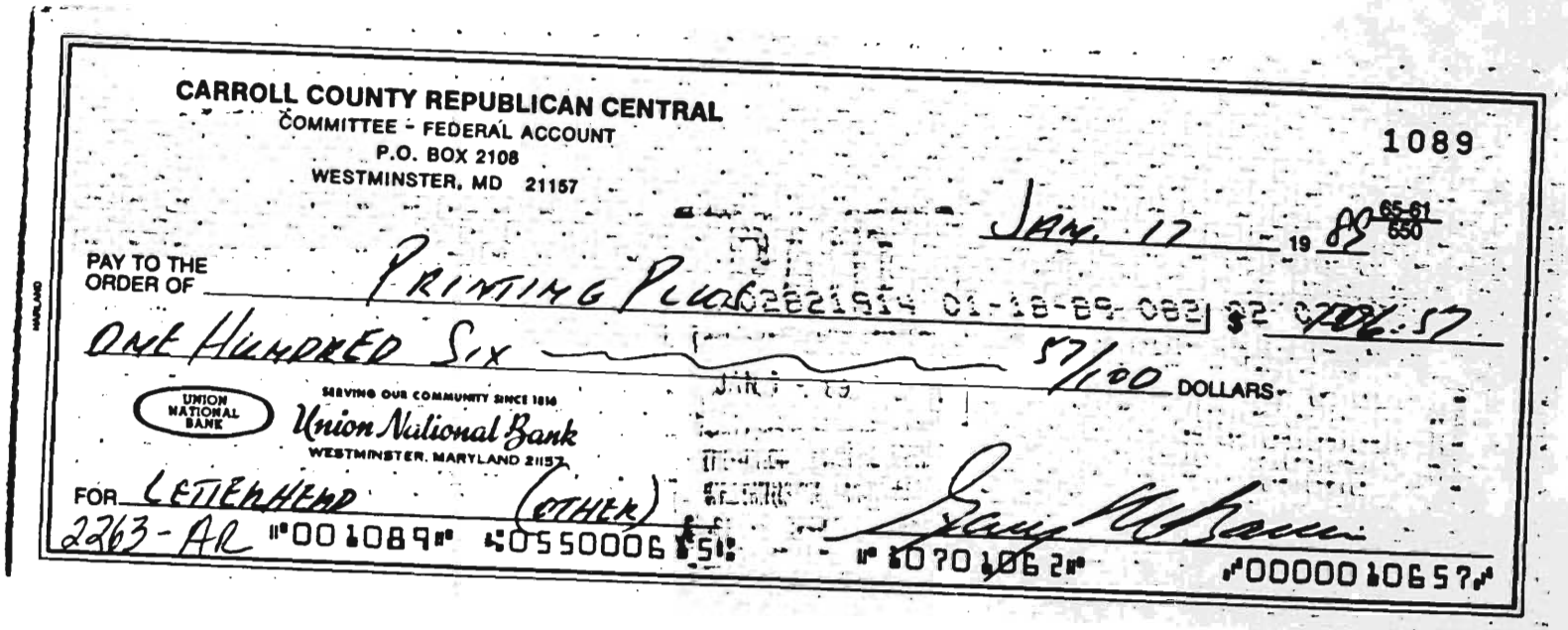
FOR Computer rental

⑈001087⑈ ⑆055000615⑆ ⑈0701062⑈ ⑈0000120000⑈

2000311496

FOR DEPOSIT ONLY
MADISON-BRADFORD FEDERAL
SAVINGS & LOAN ASSOCIATION
6721 HARFORD ROAD
BALTIMORE, MARYLAND 2123
213-0544G
2520-7121-4
2520-7121-4
FB 97 01
ARNET BANK/MD
800 GUILFORD AVE
BALTIMORE, MD. 21202
042000018

90040811497



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1089

JAN. 17 19 89 65-61/550

PAY TO THE ORDER OF PRINTING PLUS 02821914 01-18-89 082 $ 106.57

ONE HUNDRED SIX 57/100 DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR LETTERHEAD (OTHER)

2263-AR ⑈001089⑈ ⑆055000651⑆ ⑈0701062⑈ ⑈00000106 57⑈

PRINTING PLUS
FOR DEPOSIT ONLY

PAY ANY BANK
2520 7301 8

JAN 1 1989

PROVIDENT BK of MD
PAY ANY BANK
2520 7301 8

PROVIDENT BANK OF MD

0 0 0 4 0 3 1 1 4 9 8

Nº 2263

PRINTING PLUS... LETTER

1840C York Road, Timonium, Maryland 21093 (301) 561-9595

COMPANY/NAME BENTLEY (MD)

NAME LESLIE JACOBY PHONE 337-7222

DATE OF ORDER	PRINT DATE	DATE DELIVERED	CUSTOMER P.O. #	RESALE NO
12/21/88		1/3/89		

PLACE SPECIAL INSTRUCTION STICKER HERE

COPIES

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	8½ x 11	8½ x 14	11 x 17	OTHER	20# BOND	24# BOND	COVER STOCK	CARD STOCK	PAST STOCK	CANARY	OTHER	WHITE	OTHER	BLACK	OTHER	
	15			2	2					2							2		2		101.50

JOB DESCRIPTION: 1500 - 15 on (LETTERHEAD) 3000 pages

SPECIAL INSTRUCTIONS: 15 ON 20# BOND

PLACE SPECIAL INSTRUCTION STICKER HERE

INSTANT PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	8½ x 11	8½ x 14	11 x 17	OTHER	20# BOND	24# BOND	COVER STOCK	CARD STOCK	PAST STOCK	CANARY	OTHER	WHITE	OTHER	BLACK	OTHER	

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

PLACE SPECIAL INSTRUCTION STICKER HERE

Pd 1/17/89 CK# 1085

QUICK PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	8½ x 11	8½ x 14	11 x 17	OTHER	20# BOND	24# BOND	COVER STOCK	CARD STOCK	PAST STOCK	CANARY	OTHER	WHITE	OTHER	BLACK	OTHER	

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

PLACE SPECIAL INSTRUCTION STICKER HERE

SPECIALTY PRINTING

ITEM	NO. ORIGINALS	QUANTITY TOTAL	QUANTITY RUN	PRINT ONE SIDE	PRINT TWO SIDES	8½ x 11	8½ x 14	11 x 17	OTHER	20# BOND	24# BOND	COVER STOCK	CARD STOCK	PAST STOCK	CANARY	OTHER	WHITE	OTHER	BLACK	OTHER	

JOB DESCRIPTION:

SPECIAL INSTRUCTIONS:

PRINTING PREPARATION

TYPE	NEGS.	Strip	Score/Perf	Drill	GBC/Velo
REV.	H/T	Plates	Fold	#'s	Handtime
Stats	Screen	Stock	Pad	Staple	
Paste-Up	DX's	Cut	Coil	Booklet	

☐ CUSTOMER PICKED UP ART ☐ CALL CUSTOMER WHEN ORDER IS COMPLETED

☐ PRESSPERSON RETURN ART TO JOB SLEEVE P.P. INITIAL

ORDER RECEIVED BY

PLACE SPECIAL INSTRUCTION STICKER HERE

PLEASE PAY FROM THIS INVOICE

PRINTING PLUS' CASH & CARRY POLICY ELIMINATES A CREDIT DEPARTMENT, BOOKKEEPING, AND COLLECTION EXPENSES. WE OPERATE IN THIS MANNER SO THAT THE SAVINGS MAY BE PASSED ALONG TO YOU BY OFFERING CONSISTENTLY LOW PRICES.

PROOF-AFFADAVIT

We have read this proof through carefully for spelling of names, addresses, telephone numbers, dates, prices, etc. Our O.K. relieves Printing Plus of all responsibility and indicates that we have received the proof, carefully examined it, and it is entirely satisfactory. You are now authorized to proceed with the printing.

OK AS IS ☐ OK WITH Corrections ☐

By _____

NO PROOF RELEASE: I hereby authorize Printing Plus to print my job without prior proofing. By this authorization, I release Printing Plus from any responsibility should any errors of any kind be found in my layout after it's printed.

By _____

PAYMENT RECEIVED BY

CASH _____

CHECK # _____

CHARGED:

MASTER CARD/VISA

_____

_____

Thank You

OTHER SERVICES	
SALES TAX	5.07
	106.57
DEPOSIT	

2 0 0 4 0 3 1 1 5 0 0

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1091

65-61
550

Control# 11-30396

Feb. 7 19 89

PAY TO THE ORDER OF International Limousine Service, Inc. 2-10-89 004 $ 1000.00

One Thousand ---------- 00/100 DOLLARS

SERVING OUR COMMUNITY SINCE 1874
UNION NATIONAL BANK
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR shuttle service (other)

⑈001091⑈ ⑆055000615⑆ ⑈0702062⑈ ⑈0000100000⑈

FOR DEPOSIT ONLY
INTERNATIONAL LIMOUSINE
SERVICE, INC.

0067 9 6 8 1

09 JAN 1 9

0520-0027-B
0520-0027-B 02-10-95
205450869

Trust Co.
Deposit to the Account of
Fifth Third Bank
Marysville, OH
FOR CLEARING ONLY

Customer ID
042006

042006

P 0 0 4 0 3 1 1 3 0 1

INVOICE

INTERNATIONAL LIMOUSINE SERVICE, INC.
AN E.I. KANE CO.®

ngton: (202) 388-6800
imore: (301) 636-4700

CUSTOMER NO.	NCBENTLEY
DATE	01/22/89

CARROLL CO. REPUBLICAN CENTRAL
SHARON W. HORNBERGER
P.O. BOX 2108
WESTMINSTER MD 21157

MAIL REMITTANCE TO
P.O. BOX 7410
BALTIMORE, MD. 21227

ATE	SERVICES RENDERED	CHARGES	CREDITS
0/89	ORDER #6638		
	PASS		
	DEPOSIT		
0/89	ORDER #6653		
	BASIC TRIP		
	PASS		
0/89	ORDER #6637		
	BASIC TRIP		
	PASS		

Pd 3/16 check

ENT DUE UPON RECEIPT. A SERVICE CHARGE OF ONE AND ONE HALF PERCENT (1-½) ANNUAL RATE WILL BE MADE ON ALL BALANCES OUTSTANDING AFTER THIRTY (30) DAYS OF BILLING. LIST SERVATION NUMBERS ON CHECK FOR PROPER CREDIT TO YOUR ACCOUNT.

CONTROL NO.	11-30396

EV. 9/88

OFFICE

9 0 0 4 0 3 1 1 5 0 3

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1092

65-61/550

Feb. 7 19 89

PAY TO THE ORDER OF Leslie Jacoby $ 432.89

Four Hundred Thirty-two ---------- 89/100 DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1816
Union National Bank
WESTMINSTER, MARYLAND 21157

FNEMD 088 104313 13 1128 020989 0172M
CASHED CHECK $432.89

FOR computer supply (other)

⑈001092⑈ ⑆055000615⑆ ⑈0702062⑈ ⑈000043289⑈

FEB 98 09
052000113
MD (1) 0.0

FEB -9 98

0520-0011-3

FNB OF MD
110 South Paca Street
Bel Tel 301-347-6183
Baltimore, MD

160-783-3-CV
1-310-203-8823-3 Mary

0004031150 4

P 0 0 4 0 3 1 1 5 0 5

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD. 21157

1094

65-61/550

Feb. 9 19 89

PAY TO THE ORDER OF Baltimore County Victory Fund $ 5533.72

Five Thousand Five Hundred Thirty-three -------- 72/100 DOLLARS

UNION NATIONAL BANK
SERVING OUR COMMUNITY SINCE 1934
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR transfer (other)

⑈001094⑈ ⑆055000615⑆ ⑈0707062⑈ ⑈0000553372⑈

Deposit only
Account #1-1-139 36

Jeremiah
Edward
2-16-89

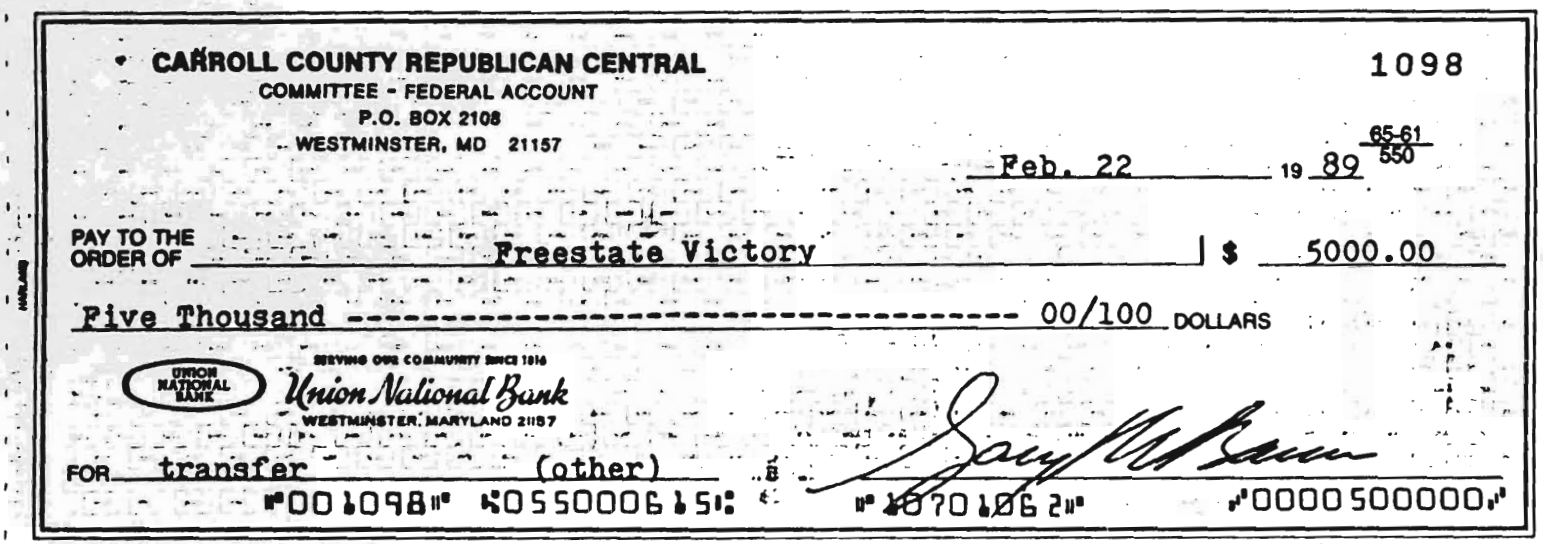
0031 8 5 9 1 2

FEB 13 89

FIRST BANK/MD
GREENSPRING AVE.
BALTIMORE, MD. 21208
00000000

FEB 13 89

0004031150306



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1098

65-61
550

Feb. 22 19 89

PAY TO THE ORDER OF Freestate Victory $ 5000.00

Five Thousand ---------- 00/100 DOLLARS

SERVING OUR COMMUNITY SINCE 1816
UNION NATIONAL BANK
Union National Bank
WESTMINSTER, MARYLAND 21157

FOR transfer (other)

Gary M. Baum

⑈001098⑈ ⑆055000615⑆ ⑈0070106 2⑈ ⑈0000500000⑈

9004081507

Deposit Only

7873961

0412 93127

30 / Mainland
Regional Bank
Bananuic, NJ 40

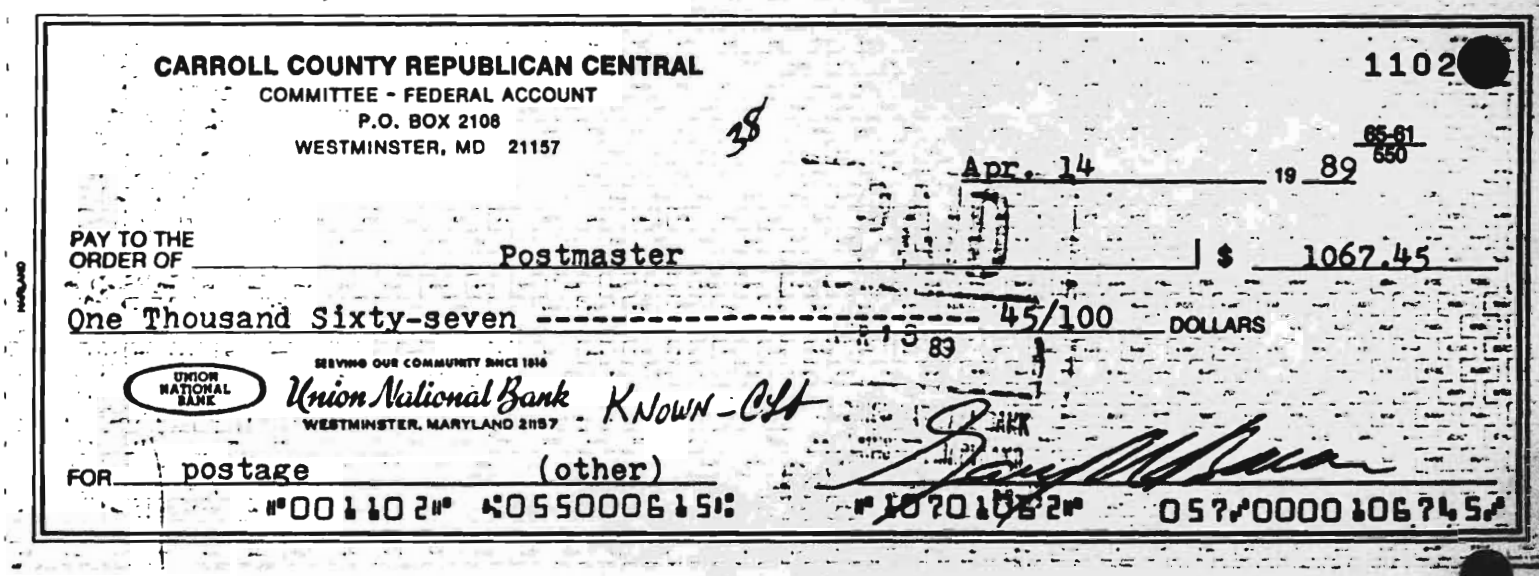
MP 9 89

60088 00100

00100

0004031150 8

9 0 0 4 0 3 1 1 5 0 9



CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER, MD 21157

1102

38

65-61
550

Apr. 14 19 89

PAY TO THE ORDER OF Postmaster $ 1067.45

One Thousand Sixty-seven ---------- 45/100 DOLLARS

SERVING OUR COMMUNITY SINCE 1816
UNION NATIONAL BANK
Union National Bank
WESTMINSTER, MARYLAND 21157

KNOWN - CH

FOR postage (other)

⑈001102⑈ ⑆055000615⑆ ⑈1070106⑈ 057 0000106745

FOR DEPOSIT ONLY
POSTMASTER'S ACCT.
WESTMINSTER, MD 21157
Acct. # 055 000 615

WESTMINSTER MD USPO
APR 17 1989

0202 057 000

UNION NATL. BK.
117 E. MAIN ST.
Westminster
Maryland 21157
▷ 055000615 ◁

APR 18 89

STAMPS

P0040311510

1 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 0
C/O LOUIS E WISER,JR. 0
2810 GILLIS RD
MT AIRY MD 21771

MINIMUM BALANCE 80.88
AVG AVAIL BAL 80.88

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

TAX ID NUMBER 52-0747703

05/10/89 through 06/14/89

PAGE 1

BALANCE ST STATEMENT	DEPOSITS & OTHER CREDITS NO.	AMOUNT	CHECKS & OTHER DEBITS NO.	AMOUNT	BALANCE THIS STATEMENT
80.88 +		.00	1	2.00 =	78.88

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
NCE FORWARD			05/10/89	80.88
CE CHARGE	2.00		06/14/89	78.88

YOUR CHECKS, SEQUENCED

NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT

OVERDRAFT CHECKING

DATE	PAYMENT DUE DATE	FINANCE CHARGE YEAR TO DATE	RESERVE LIMIT	AVAILABLE RESERVE	PREVIOUS BALANCE	ADVANCES	PAYMENTS

CHARGE ACCRUED THIS PERIOD $ NEW BALANCE $

D BALANCES OF OR LESS ON UNPAID B

L PERCENTAGE RATE DAILY PERIODIC RATE ANNUAL P PERIODIC RATE

MINIMUM PAYMENT DUE

Blumberg No. 5118 EXHIBIT IV

E CHARGE IS COMPUTED ON THE PRINCIPAL BALANCE BY APPLICATION OF THE DAILY PERIODIC RATE

NOTICE

1 01

UNION NATIONAL BANK

Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 0
C/O GARY BAUER 1
924 CENTURY ST
HAMPSTEAD MD 21074

MINIMUM BALANCE 83.08
AVG AVAIL BAL 273.69

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

TAX ID NUMBER 52-0747703

04/12/89 through 05/10/89

PAGE 1

BALANCE T STATEMENT	DEPOSITS & OTHER CREDITS NO.	AMOUNT	CHECKS & OTHER DEBITS NO.	AMOUNT	BALANCE THIS STATEMENT
1,150.53 +		.00	2	1,069.65 =	80.88

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
CE FORWARD			04/12/89	1,150.53
# 1102	1,067.45		04/18/89	83.08
CE CHARGE	2.20		05/10/89	80.88

YOUR CHECKS SEQUENCED

NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
02	1,067.45						

OVERDRAFT CHECKING

DATE	PAYMENT DUE DATE	FINANCE CHARGE YEAR TO DATE	RESERVE	AVAILABLE RESERVE	PREVIOUS BALANCE	ADVANCES	PAYMENTS

HARGE ACCRUED THIS PERIOD $ NEW BALANCE $

BALANCES OF OR LESS	
PERCENTAGE RATE	DAILY PERIODIC RATE

ON UNPAID BALANCES IN EXCESS OF	
ANNUAL PERCENTAGE RATE	DAILY PERIODIC RATE

MINIMUM PAYMENT DUE

CHARGE IS COMPUTED ON THE PRINCIPAL BALANCE APPLICATION OF THE DAILY PERIODIC RATE

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
6,156.53	+		.00	—	3	5,006.00	=	1,150.53

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
	* INTEREST PAID 1988	27.77 *		
ANCE FORWARD			03/08/89	6,156.53
CK # 1098	5,000.00		03/10/89	1,156.53
CK # 1100	2.00		03/15/89	1,154.53
CK # 1101	4.00		03/17/89	1,150.53

> 0040811 5

YOUR CHECKS ARRANGED

CK NO	AMOUNT	CHECK NO		AMOUNT	CHECK NO	AMOUNT
1098	5,000.00					
1100	2.00					
1101	4.00					

OVERDRAFT CHECKING

NCE CHARGE

NEW BALANCE $

NPAID BALANCES OF UNLESS

UNPAID BALANCES PER ANNUM OF

NUAL PERCENTAGE RATE

ANNUAL PERCENTAGE RATE

MINIMUM PAYMENT DUE

NOTICE

NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 0
C/O GARY BAUER 3
924 CENTURY ST
HAMPSTEAD MD 21074

MINIMUM BALANCE 1,150.53
AVG AVAIL BAL 1,294.64

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

03/08/89 through 04/12/89

BALANCE LAST STATEMENT	DEPOSITS & OTHER CREDITS NO.	DEPOSITS & OTHER CREDITS AMOUNT	CHECKS & OTHER DEBITS NO.	CHECKS & OTHER DEBITS AMOUNT	BALANCE THIS STATEMENT
					1,150.53

00 01 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 1
C/O GARY BAUER 7
924 CENTURY ST
HAMPSTEAD MD 21074

MINIMUM BALANCE 5,631.61
AVG AVAIL BAL 7,075.81

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

02/08/89 through 03/08/89

BALANCE LAST STATEMENT	DEPOSITS & OTHER CREDITS NO.	DEPOSITS & OTHER CREDITS AMOUNT	CHECKS & OTHER DEBITS NO.	CHECKS & OTHER DEBITS AMOUNT		BALANCE THIS STATEMENT
13,491.22	1	533.72	7	7,868.41	=	6,156.53

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
	* INTEREST PAID 1988	27.77 *		
BALANCE FORWARD			02/08/89	13,491.22
CHECK # 1092	432.89		02/10/89	13,058.33
CHECK # 1091	1,000.00		02/10/89	12,058.33
CHECK # 1095	889.00		02/14/89	11,169.33
CHECK # 1094	5,533.72		02/14/89	5,635.61
CHECK # 1096	4.00		02/21/89	5,631.61
DEPOSIT		533.72	02/23/89	6,165.33
CHECK # 1097	4.80		02/23/89	6,160.53
CHECK # 1099	4.00		03/02/89	6,156.53

7104 03

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
1091	1,000.00						
1092	432.89						
1094	5,533.72						
1095	889.00						
1096	4.00						
1097	4.80						
1099	4.00						

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE

ANNUAL PERCENTAGE RATE

MINIMUM PAYMENT DUE

NOTICE

07

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 1
C/O GARY BAUER 5
924 CENTURY ST
HAMPSTEAD MD 21074

MINIMUM BALANCE 13,491.22
AVG AVAIL BAL 16,427.01

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

01/11/89 through 02/08/89

PAGE 1

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
16,833.66	+	1	190.23	–	5	3,532.67	=	13,491.22

DESCRIPTION		CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
* INTEREST PAID 1988			27.77 *		
BALANCE FORWARD				01/11/89	16,833.66
DEPOSIT			190.23	01/17/89	17,023.89
CHECK #	1088	21.30		01/17/89	17,002.59
CHECK #	1089	106.57		01/19/89	16,896.02
CHECK #	1090	4.80		01/31/89	16,891.22
CHECK #	1087	1,200.00		02/02/89	15,691.22
CHECK #	1086	2,200.00		02/07/89	13,491.22

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
1086	2,200.00						
1087	1,200.00						
1088	21.30						
1089	106.57						
1090	4.80						

OVERDRAFT CHECKING

PERIODIC RATE	PAYMENT DUE DATE	MINIMUM PAYMENT	OTHER CHARGES	NEW BALANCE	OVERDRAFT LIMIT	PAST DUE	NEW BALANCE

FINANCE CHARGE

OVERDRAFT BALANCES OF	DAYS IN BILLING PERIOD	OVERDRAFT BALANCES BEYOND LIMIT OF	DAYS IN BILLING PERIOD	MINIMUM PAYMENT DUE
ANNUAL PERCENTAGE RATE		ANNUAL PERCENTAGE RATE		

NOTICE:

00 01 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUPLICAN 38
CENTRAL COMMITTEE/FEDERAL ACCT 0
C/O GARY BAUER 7
924 CENTURY ST
HAMPSTEAD MD 21074

MINIMUM BALANCE 16,833.66
AVG AVAIL BAL 19,136.88

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

12/14/88 through 01/11/89

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
20,432.94	+		.00	–	7	3,599.28	=	16,833.66

DESCRIPTION		CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
		* INTEREST PAID 1988	17.77 *		
BALANCE FORWARD				12/14/88	20,432.94
CHECK #	1074	12.71		12/15/88	20,420.23
CHECK #	1080	62.16		12/16/88	20,358.07
CHECK #	1082	460.50		12/21/88	19,897.57
CHECK #	1083	375.00		12/28/88	19,522.57
CHECK #	1084	176.91		01/04/89	19,345.66
CHECK #	1081	2,012.00		01/05/89	17,333.66
CHECK #	1085	500.00		01/06/89	16,833.66

9 3 0 4 0 3 1

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
1074	12.71						
1080	62.16						
1081	2,012.00						
1082	460.50						
1083	375.00						
1084	176.91						
1085	500.00						

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE		ANNUAL PERCENTAGE RATE		MINIMUM PAYMENT DUE

NOTICE

00 01 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE
FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER MD 21157

38
2
11

MINIMUM BALANCE 14,084.76
AVG AVAIL BAL 19,844.82

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

11/09/88 through 12/14/88

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
15,084.76	+	2	7,719.52	-	11	2,371.34	=	20,432.94

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
* INTEREST PAID 1988		27.77 *		
BALANCE FORWARD			11/09/88	15,084.76
CHECK # 1073	1,000.00		11/10/88	14,084.76
DEPOSIT		7,500.00	11/14/88	21,584.76
CHECK # 1072	37.86		11/14/88	21,546.90
CHECK # 1071	119.43		11/14/88	21,427.47
CHECK # 1069	24.00		11/14/88	21,403.47
CHECK # 1076	116.56		11/14/88	21,286.91
CHECK # 1070	170.63		11/14/88	21,116.28
CHECK # 1063	204.00		11/14/88	20,912.28
DEPOSIT		219.52	11/22/88	21,131.80
CHECK # 1077	168.00		11/25/88	20,963.80
CHECK # 1075	26.46		11/28/88	20,937.34
CHECK # 1078	4.40		11/29/88	20,932.94
CHECK # 1079	500.00		12/08/88	20,432.94

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
1063	204.00	1076	116.56				
1069	24.00	1077	168.00				
1070	170.63	1078	4.40				
1071	119.43	1079	500.00				
1072	37.86						
1073	1,000.00						
1075	26.46						

OVERDRAFT CHECKING

FINANCE CHARGE

NEW BALANCE

ANNUAL PERCENTAGE RATE		ANNUAL PERCENTAGE RATE		MINIMUM PAYMENT DUE

NOTICE

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE 7
FEDERAL ACCOUNT 24
P.O. BOX 2108
WESTMINSTER MD 21157

MINIMUM BALANCE 3,585.03
AVG AVAIL BAL 7,501.27

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

10/12/88 through 11/09/88

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
4,715.95	+	7	15,614.61	-	24	5,245.80	=	15,084.76

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
* INTEREST PAID 1988		27.77 *		
BALANCE FORWARD			10/12/88	4,715.95
DEPOSIT		1,224.61	10/13/88	5,940.56
CHECK # 1045	35.49		10/13/88	5,905.07
CHECK # 1048	564.30		10/14/88	5,340.77
CHECK # 1051	47.60		10/19/88	5,293.17
CHECK # 1049	108.57		10/19/88	5,184.60
CHECK # 1047	37.50		10/20/88	5,147.10
CHECK # 1054	255.00		10/21/88	4,892.10
DEPOSIT		841.50	10/24/88	5,733.60
CHECK # 1037	4.40		10/24/88	5,729.20
CHECK # 1050	28.67		10/24/88	5,700.53
CHECK # 1052	7.86		10/25/88	5,692.67
CHECK # 1055	814.76		10/25/88	4,877.91
CHECK # 1058	205.08		10/26/88	4,672.83
CHECK # 1056	88.80		10/26/88	4,584.03
CHECK # 1057	999.00		10/26/88	3,585.03
DEPOSIT		4,114.50	10/31/88	7,699.53
CHECK # 1059	105.69		10/31/88	7,593.84
CHECK # 1060	262.26		10/31/88	7,331.58
CHECK # 1061	541.30		10/31/88	6,790.28
CHECK # 1062	10.00		11/01/88	6,780.28
DEPOSIT # 1858		1,000.00	11/02/88	7,780.28

* * * C O N T I N U E D * * *

YOUR CHECKS SEQUENCED

NUMBER	AMOUNT	NUMBER	AMOUNT	NUMBER	AMOUNT	NUMBER	AMOUNT
1037	4.40	1051	47.60	1058	205.08	1066	72.71
1045	35.49	1052	7.86	1059	105.69	1067	6.81
1046	355.00	1053	230.00	1060	262.26	1068	75.20
1047	37.50	1054	255.00	1061	541.30		
1048	564.30	1055	814.76	1062	10.00		
1049	108.57	1056	88.80	1064	325.00		
1050	28.67	1057	999.00	1065	64.80		

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE

ANNUAL PERCENTAGE RATE

MINIMUM PAYMENT DUE

NOTICE

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE 7
FEDERAL ACCOUNT 24
P.O. BOX 2108
WESTMINSTER MD 21157

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

10/12/88 through 11/09/88

BALANCE LAST STATEMENT	DEPOSITS & OTHER CREDITS NO.	DEPOSITS & OTHER CREDITS AMOUNT	CHECKS & OTHER DEBITS NO.	CHECKS & OTHER DEBITS AMOUNT	BALANCE THIS STATEMENT

DESCRIPTION		CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
DEPOSIT			8,300.00	11/02/88	16,080.28
DEPOSIT			48.00	11/04/88	16,128.28
CHECK #	1067	6.81		11/07/88	16,121.47
CHECK #	1065	64.80		11/07/88	16,056.67
CHECK #	1053	230.00		11/07/88	15,826.67
CHECK #	1046	355.00		11/07/88	15,471.67
CHECK #	1064	325.00		11/08/88	15,146.67
DEPOSIT			86.00	11/09/88	15,232.67
CHECK #	1066	72.71		11/09/88	15,159.96
CHECK #	1068	75.20		11/09/88	15,084.76

CHECKS OUTSTANDING

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE	ANNUAL PERCENTAGE RATE	MINIMUM PAYMENT DUE

00 01 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE
FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER MD 21157

	38
	6
	26

MINIMUM BALANCE 2,912.35
AVG AVAIL BAL 3,908.08

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

09/14/88 through 10/12/88

BALANCE	DEPOSITS & OTHER CREDITS NO.	DEPOSITS & OTHER CREDITS AMOUNT	CHECKS & OTHER DEBITS NO.	CHECKS & OTHER DEBITS AMOUNT	BALANCE THIS STATEMENT
3,610.63	6	3,943.00	26	2,837.68	4,715.95

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
	* INTEREST PAID 1988	27.77 *		
BALANCE FORWARD			09/14/88	3,610.63
CHECK # 1004	600.00		09/15/88	3,010.63
DEPOSIT		615.00	09/16/88	3,625.63
CHECK # 1021	21.60		09/16/88	3,604.03
DEPOSIT # 61000		240.00	09/19/88	3,844.03
CHECK # 1014	9.35		09/19/88	3,834.68
CHECK # 1020	15.00		09/19/88	3,819.68
CHECK # 1030	67.94		09/19/88	3,751.74
CHECK # 1024	400.00		09/19/88	3,351.74
CHECK # 1025	46.17		09/20/88	3,305.57
CHECK # 1029	92.22		09/21/88	3,213.35
DEPOSIT		210.00	09/23/88	3,423.35
CHECK # 1031	25.00		09/27/88	3,398.35
CHECK # 1033	100.00		09/27/88	3,298.35
CHECK # 1034	10.00		09/27/88	3,288.35
CHECK # 1023	150.00		09/27/88	3,138.35
DEPOSIT		240.00	09/28/88	3,378.35
CHECK # 1026	100.00		09/28/88	3,278.35
CHECK # 1027	216.00		09/28/88	3,062.35
CHECK # 1035	150.00		09/30/88	2,912.35
DEPOSIT		41.00	10/03/88	2,953.35
DEPOSIT		2,597.00	10/03/88	5,550.35

* * * C O N T I N U E D * * *

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT
41	9.69	1024	400.00	1031	25.00	1039	174.84
1004	600.00	1025	46.17	1032	40.00	1040	20.00
1014	9.35	1026	100.00	1033	100.00	1042	82.85
1020	15.00	1027	216.00	1034	10.00	1043	375.27
1021	21.60	1028	29.10	1035	150.00	1044	56.76
1022	10.39	1029	92.22	1036	10.00		
1023	150.00	1030	67.94	1038	25.00		

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE

ANNUAL PERCENTAGE RATE

MINIMUM PAYMENT DUE

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE 6
FEDERAL ACCOUNT 26
P.O. BOX 2108
WESTMINSTER MD 21157

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703 09/14/88 through 10/12/88

BALANCE LAST STATEMENT	+ DEPOSITS & OTHER CREDITS NO.	AMOUNT	− CHECKS & OTHER DEBITS NO.	AMOUNT	= BALANCE THIS STATEMENT

DESCRIPTION		CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
CHECK #	1038	25.00		10/03/88	5,535.35
CHECK #	1036	10.00		10/03/88	5,515.35
CHECK #	1039	174.84		10/04/88	5,340.51
CHECK #	1032	40.00		10/06/88	5,300.51
CHECK #	41	9.69 —		10/11/88	5,290.82
CHECK #	1022	10.89		10/11/88	5,279.93
CHECK #	1040	20.00		10/11/88	5,259.93
CHECK #	1044 ok	56.76 —		10/11/88	5,203.17
CHECK #	1042	82.85 —		10/11/88	5,120.32
CHECK #	1028	29.10		10/12/88	5,091.22
CHECK #	1043	375.27 —		10/12/88	4,715.95

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT

OVERDRAFT CHECKING

FINANCE CHARGE

	ANNUAL PERCENTAGE RATE		ANNUAL PERCENTAGE RATE		MINIMUM PAYMENT DUE

00 01 01

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN
CENTRAL COMMITTEE
FEDERAL ACCOUNT
P.O. BOX 2108
WESTMINSTER MD 21157

38
11
18

MINIMUM BALANCE 1,110.14
AVG AVAIL BAL 2,386.93

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

08/10/88 through 09/14/88

BALANCE LAST STATEMENT		DEPOSITS & OTHER CREDITS NO.	AMOUNT		CHECKS & OTHER DEBITS NO.	AMOUNT		BALANCE THIS STATEMENT
1,110.14	+	11	8,740.50	-	19	6,240.01	=	3,610.63

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
**********IMPORTANT FUNDS AVAILABILITY INFORMATION ENCLOSED**********				
* INTEREST PAID 1988 27.77 *				
BALANCE FORWARD			08/10/88	1,110.14
DEPOSIT		430.00	08/12/88	1,540.14
DEPOSIT		141.00	08/15/88	1,681.14
DEPOSIT		500.00	08/18/88	2,181.14
CHECK	6.00		08/24/88	2,175.14
CHECK	488.25		08/24/88	1,686.89
DEPOSIT		50.00	08/25/88	1,736.89
DEPOSIT		780.00	08/26/88	2,516.89
CHECK # 1001	206.25		08/26/88	2,310.64
DEPOSIT # 1924		520.00	08/30/88	2,830.64
DEPOSIT # 1927		210.00	08/31/88	3,040.64
CHECK # 1008	350.00		09/01/88	2,690.64
CHECK # 1005	13.39		09/01/88	2,677.25
CHECK # 1003	57.02		09/02/88	2,620.23
CHECK # 1006	91.92		09/02/88	2,528.31
DEPOSIT # 1916		1,180.00	09/06/88	3,708.31
DEPOSIT # 1855		1,505.00	09/06/88	5,213.31
DEPOSIT # 1919		2,224.50	09/06/88	7,437.81
CHECK # 1007	240.40		09/06/88	7,197.41
JHH CHECK ORDERS CHK ORDERS	55.58		09/07/88	7,141.83

* * * C O N T I N U E D * * *

YOUR CHECKS SEQUENCED

	AMOUNT		AMOUNT		AMOUNT
	6.00	1007	240.40	1016	773.75
	488.25	1008	350.00	1017	188.25
1001	206.25	1009	270.00	1018	60.00
1002	14.00	1010	13.69	1019	56.47
1003	57.02	1011	528.04		
1005	13.39	1012	2,009.00		
1006	91.92	1013	818.00		

OVERDRAFT CHECKING

FINANCE CHARGE

ANNUAL PERCENTAGE RATE

ANNUAL PERCENTAGE RATE

MINIMUM PAYMENT DUE

UNION NATIONAL BANK
Community Service Since 1816

115 EAST MAIN STREET
WESTMINSTER, MD. 21157
848-7200 876-2051

CARROLL COUNTY REPUBLICAN 38
CENTRAL COMMITTEE 11
FEDERAL ACCOUNT 18
P.O. BOX 2108
WESTMINSTER MD 21157

A STATEMENT OF YOUR CHECKING ACCOUNT NO. 10701062

FDIC

TAX ID NUMBER 52-0747703

08/10/88 through 09/14/88

BEGINNING BALANCE	DEPOSITS & OTHER CREDITS NO.	DEPOSITS & OTHER CREDITS AMOUNT	CHECKS & OTHER DEBITS NO.	CHECKS & OTHER DEBITS AMOUNT	BALANCE THIS STATEMENT
		-		=	

DESCRIPTION	CHECKS AND OTHER DEBITS	DEPOSITS AND OTHER CREDITS	DATE	BALANCE
CHECK # 1017	188.25		09/07/88	6,953.58
CHECK # 1013	818.00		09/07/88	6,135.58
CHECK # 1012	2,009.00		09/07/88	4,126.58
CHECK # 1016	773.75		09/08/88	3,352.83
CHECK # 1010	13.69		09/09/88	3,339.14
CHECK # 1002	14.00		09/12/88	3,325.14
CHECK # 1019	56.47		09/13/88	3,268.67
CHECK # 1009	270.00		09/13/88	2,998.67
CHECK # 1011	528.04		09/13/88	2,470.63
DEPOSIT		1,200.00	09/14/88	3,670.63
CHECK # 1018	60.00		09/14/88	3,610.63

YOUR CHECKS SEQUENCED

CHECK NO.	AMOUNT	CHECK NO.	AMOUNT	CHECK NO.	AMOUNT

OVERDRAFT CHECKING

PREVIOUS DATE	PERIODIC RATE	CHARGES	BALANCE	AVG. DAILY BALANCE	ACCRUED	NEW BALANCE

FINANCE CHARGE

ON DAILY BALANCES UP TO	FOR ITS	ON DAILY BALANCES IN EXCESS OF	FOR ITS	MINIMUM PAYMENT DUE
ANNUAL PERCENTAGE RATE		ANNUAL PERCENTAGE RATE		

NOTICE

OGC 4197

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1866-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

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2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 OCT -5 PM 1:08

October 3, 1989

Mr. Danny L. McDonald,
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 OCT -5 PM 4:23

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. McDonald:

I enclose Congresswoman Bentley's Answers to Interrogatories and Request for Production of Documents in the above case.

Respectfully,

Benson Everett Legg

BEL:mtm
Enclosure
4500R/69

cc: Jeffrey Long, Esquire
The Honorable Helen Delich Bentley

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

BEFORE THE
FEDERAL ELECTION COMMISSION

89 OCT -5 PM 1:08

In the Matter of *
MUR 2936 *

* * * * * * * * * * * * * * * *

CONGRESSWOMAN BENTLEY'S ANSWERS TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Congresswoman Helen Delich Bentley, by Benson Everett Legg, her undersigned attorney, hereby answers the Interrogatories and Request for Production of Documents submitted by the Federal Election Commission under date of August 22, 1989.

2004015025

INTERROGATORY NO. 1.

Describe your role and activities with respect to the Victory '88 program and the Bush/Quayle campaign for the 1988 general election in Maryland.

RESPONSE TO INTERROGATORY NO. 1.

Congresswoman Bentley's various roles and activities in the 1988 general election in Maryland are summarized as follows:

(1) Candidate for Congress. Mrs. Bentley was a candidate for re-election to the House of Representatives from Maryland's Second Congressional District.

(2) Victory '88 Program. In March, 1988, Congresswoman Bentley was elected by the Central Committee of the Maryland State Republican Party ("State Party") to a four-year term as Republican National Committeewoman for Maryland. Her term in

office officially began in August, 1988. Richard Taylor was elected Republican National Committeeman. As Committeewoman, Congresswoman Bentley automatically became a member of the Executive Committee of the State Party.

The National Committeewoman and Committeeman are the State Party's official representatives to the Republican National Committee, which is the national Republican Party organization. As National Committeewoman, one of Congresswoman Bentley's responsibilities was to assist the Victory '88 Program in Maryland in its efforts to (i) elect Republican candidates to local, state and national offices, and (ii) strengthen the Republican Party through voter registration drives and other party-building activities. The Victory '88 Program in Maryland included the activities of local party committees as well as the activities of the State Party.

Congresswoman Bentley is also the senior elected Republican official in Maryland. As such, she is the de facto head of the Republican Party in Maryland.

During the Fall of 1988, Congresswoman Bentley participated in weekly meetings to review the strategy and operation of the State Party's Victory '88 Program. Those who regularly participated included among others:

Daniel Fleming, the Chairman of the State Party;

Richard Taylor, the Republican National Committeeman;

Michael Burns, the Executive Director of the State Party.

During these meetings, the group regularly discussed the raising and expenditure of funds. The State Party's Program was called "Maryland Victory '88." Both Daniel Fleming and Michael Burns knew that local party committees were sponsoring their own Victory '88 programs through their local federal accounts.

During 1988, Congresswoman Bentley helped organize and participated in Victory '88 rallies for various Republican candidates, including the following:

Alan Keyes -- United States Senate;

Wayne Gilchrest -- Congress, First Congressional District;

Connie Morella -- Congress, Eighth Congressional District;

George Bush -- President;

Dan Quayle -- Vice President;

Ross Pierpont -- Congress, Third Congressional District;

During the general election campaign, Congresswoman Bentley was responsible for various Victory '88 activities that focused on party-building through volunteer efforts. These included a statewide voter registration drive, for which she was the spokeswoman at numerous functions, and a telephone bank that operated on election day to turn-out the vote.

Congresswoman Bentley also helped organize fundraising events for Victory '88. These events included the following:

(a) reception at the Maryland Club in Baltimore featuring then Treasury Secretary James Baker as the guest speaker;

(b) reception at the private residence of Manning Muntzing, featuring then Treasury Secretary Baker as the speaker;

(c) receptions in Greenbelt, Maryland and in Annapolis, Maryland, featuring Prescott Bush, the President's brother, as the speaker;

(d) reception at the private residence of Kingdon Gould, featuring Ambassador John Gavin as the speaker;

(e) reception at the residence of a physician, which featured Congresswoman Bentley as the principal speaker.

The proceeds from these fundraisers went to various Victory '88 programs. For example, the Maryland Club and Mannning Muntzing fundraisers were organized to benefit the State Party and its "Maryland Victory '88" program. Proceeds from the other fundraisers were solicited by or on behalf of Congresswoman Bentley with the understanding that she would direct the funds as she considered appropriate. She directed some of the contributions to the State Party's Victory '88 account and she directed other contributions to local party accounts.

Congresswoman Bentley also personally solicited and received approximately twenty-five donations to Victory '88. The checks were solicited with the understanding that Congresswoman Bentley would have discretion to direct and expend the contributions as she considered appropriate. She

directed some of the contributions to the State Party's Victory '88 account and she directed other contributions to local party accounts.

(3) Bush-Quayle '88. Congresswoman Bentley was the Chairman of Bush-Quayle '88. She did not raise any money for Bush-Quayle '88 during the relevant time period. Her activities did, however, include the following:

(a) Congresswoman Bentley appointed persons to serve as Chairman of various coalitions (e.g., Doctors for Bush-Quayle '88);

(b) Congresswoman Bentley was responsible for a tour of Maryland for then Senator Quayle;

(c) Congresswoman Bentley met regularly with a Bush "Kitchen Cabinet" to plan strategy;

(d) Congresswoman Bentley was the spokeswoman for Bush-Quayle '88 at press conferences; and

(e) Congresswoman Bentley coordinated local Maryland activities with the national campaign organization.

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INTERROGATORY NO. 2.

With respect to the attached list of persons, state whether you received any contribution for Victory '88 or the Bush/Quayle campaign from any of these persons. If so, for all such persons, state the date you received each contribution, from whom you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution. State whether you provided the person to whom you forwarded each contribution with the name and address of the contributor and the date of your receipt of the contribution. State whether you provided the person to whom you forwarded each contribution with the occupation or employer of the contributor.

RESPONSE TO INTERROGATORY NO. 2.

(1) Daniel Oliver. Congresswoman Bentley received this check from Richard Taylor on or about October 28, 1988. Mr. Taylor did not provide Congresswoman Bentley with any information concerning Mr. Oliver; nor did he indicate when he received Mr. Oliver's check. When Mr. Taylor forwarded the check to Congresswoman Bentley, he knew that it would be deposited into a local party committee account and not the State Party's federal account. Mrs. Bentley, therefore, assumed that depositing the check into a local account would be consistent with the contributor's intent. Congresswoman Bentley has never met Mr. Oliver, and she did not solicit his contribution.

On November 1, 1988, Congresswoman Bentley delivered the check to Sharon Hornberger, the Chairman of the Carroll County Republican Central Committee. It was Congresswoman Bentley's understanding that Ms. Hornberger would promptly deliver the check to the Treasurer of the Carroll County federal account, who would deposit it promptly. Congresswoman Bentley has been informed that Ms. Hornberger delivered the check to the Treasurer, Gary Warren Bauer, on November 1st and that he deposited it on the 2nd.

Congresswoman Bentley did not inform Ms. Hornberger of (i) the occupation or employer of Mr. Oliver, or (ii) the date on which she received the contribution. Mr. Oliver's full name and address appear on the check, and Congresswoman Bentley

assumed that the Treasurer would contact the contributor or her if he needed any information.

Attached hereto as Exhibit A are photocopies of the checks, totalling $10,300, which were delivered by Congresswoman Bentley to Ms. Hornberger on November 1, 1988. The handwritten note appearing on p. 1 of Exhibit A was written on or before November 1st by Sandie Morgan, Congresswoman Bentley's secretary.

In May 1989, when the controversy concerning Mr. Oliver's check arose, Congresswoman Bentley requested Mr. Taylor to send her whatever records he had concerning the check. Attached hereto as Exhibit B is a copy of a letter of October 21, 1988, from Fred Bush to Richard Taylor, with which Mr. Oliver's check was enclosed.

(2)-(3) Andrew Manos; Peter Zourdos. Congresswoman Bentley received the checks from Andrew Manos and Peter Zourdos on or about October 28, 1988. Although Congresswoman Bentley has no independent recollection or written record of the dates of receipt, it was her practice to forward checks within several days of receiving them. Also, Congresswoman Bentley turned over a group of checks to Sharon Hornberger on October 28, 1988. The Manos and Zourdos checks were turned over to Ms. Hornberger on November 1, 1988. Thus, Congresswoman Bentley assumes that she received the Manos and Zourdos checks between October 28th and November 1st.

As is indicated in Exhibit A, the Manos and Zourdos checks were part of the group that Congresswoman Bentley delivered to Sharon Hornberger on November 1, 1988. It is Congresswoman Bentley's understanding that Sharon Hornberger delivered them to Gary Warren Bauer the same day and that they were deposited on November 2nd.

Congresswoman Bentley received the Manos and Zourdos checks from Richard Taylor. At that time, Mr. Taylor knew that the checks would be deposited into a local party committee federal account and not the State Party's federal account. Congresswoman Bentley assumed that this disposition would be consistent with the donors' intent.

Congresswoman Bentley did not provide Ms. Hornberger with the occupation and employer of Messrs. Manos and Zourdos, and she did not inform Ms. Hornberger of the date on which she had received the checks. The addresses of both gentlemen were on the checks and Congresswoman Bentley assumed that the Treasurer would contact her or them if he needed any information.

In May of 1989, after the controversy over the checks arose, Congresswoman Bentley requested Mr. Taylor to provide her with whatever documentation he had concerning the checks. Attached hereto as Exhibit C is an undated note from Fred Bush to Mr. Taylor forwarding the checks.

(4) Ann McLaughlin. This was also a check that Congresswoman Bentley received from Richard Taylor under

circumstances identical to her receipt of the Oliver, Manos and Zourdos checks. She believes that she received the McLaughlin check on or about October 28, 1988. She forwarded it to Sharon Hornberger on November 1, 1988, and it was among the group of checks delivered to Gary Warren Bauer that day.

Congresswoman Bentley did not provide Sharon Hornberger with the occupation or employer of Ms. McLaughlin or the date on which Congresswoman Bentley received her check. Again, Congresswoman Bentley assumed that the Federal Account Treasurer would contact Ms. McLaughlin or her if he needed any information.

As with the other checks, Richard Taylor knew that they would be deposited in a local party federal account and not in the State Party's account. Congresswoman Bentley assumed that such a disposition of the check conformed with the donor's expectations.

In May 1989, after the controversy over the checks arose, Congresswoman requested Mr. Taylor to send her documentation concerning his receipt of the check. Attached hereto as Exhibit D is a copy of undated note from Fred Bush to Richard Taylor enclosing the check.

(5) Jayne H. Plank. Congresswoman Bentley personally solicited the contribution from Jayne H. Plank, a personal friend. Congresswoman Bentley received the check directly from Ms. Plank, and she had requested Ms. Plank to make the check payable to Free State Victory '88, so that it could be

deposited in the federal account of the Central Committee of Baltimore City. Congresswoman Bentley does not have a record of the date on which she received the check, but believes that she received it on October 28th or a few days before.

Consistent with Ms. Plank's intent to give Congresswoman Bentley discretion to apply the funds as she saw fit, Congresswoman Bentley subsequently elected to deposit the check in the Carroll County federal account rather than the Baltimore City federal account. Congresswoman Bentley forwarded it to Sharon Hornberger on October 28, 1988, and she assumes that Ms. Hornberger delivered it to the Treasurer of the Carroll County federal account shortly thereafter. Attached hereto as Exhibit E are copies of the checks, including Ms. Plank's check, which Congresswoman Bentley turned over to Sharon Hornberger on October 28, 1988.

(6)-(8) Tariq Mahmood, M.D.; Shaukat A. Ashai; Parvez Shah, M.D. As stated in response to Interrogatory No. 1, Congresswoman Bentley and Richard Taylor requested Melvin Bilal to organize a fundraiser for the Victory '88 Program. The fundraiser was held at the residence of a physician. The contributors were informed that their contributions would be turned over to Congresswoman Bentley or Mr. Taylor, who would apply the contributions as they saw fit. The contributors were not told, and presumably did not intend, that their contributions would be forwarded to the State Party.

Congresswoman Bentley does not have a record of the date on which she received the contributions. The checks were forwarded to Richard Taylor by Melvin Bilal, who has subsequently informed the Congresswoman that he held the checks for approximately one week before sending them to Mr. Taylor. Mr. Taylor subsequently delivered the checks to Mrs. Bentley, either personally or by mail.

Congresswoman Bentley believes that she received the checks on or about October 28, 1988. She forwarded the checks to Sharon Hornberger on November 1, 1988, and they are in the batch of checks that was turned over to Gary Warren Bauer on November 1st and deposited on November 2nd.

Congresswoman Bentley did not inform Ms. Hornberger of the occupation or employer of the contributors, or the date of her receipt of the contributions. As with the other checks, Congresswoman Bentley assumed that the Treasurer would contact the contributors or her if he needed any information.

(9)-(14) James P. Goldsmith;
Kenneth Burke;
Joseph Payne;
June Abel;
Robert B. Barnhill;
John J. Foster, Jr. These checks were solicited by Gregory Barnhill at the request of Congresswoman Bentley. It is the Congresswoman's understanding that Gregory Barnhill informed the contributors that their checks would be turned over to her and that she would apply the funds to appropriate Victory '88 activities, including the election of Republican

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candidates for local, state and national offices, and Republican party-building efforts.

Congresswoman Bentley does not recall when she received the checks solicited by Mr. Barnhill, but she believes that she received them on or about October 28, 1988. Congresswoman Bentley has been informed that the checks were collected by Mr. Barnhill and delivered to Carol L. Hirschburg. Ms. Hirschburg forwarded the checks to Virginia Love, who, in turn, forwarded them to Congresswoman Bentley. Congresswoman Bentley delivered them to Sharon Hornberger on November 1, 1988. Sharon Hornberger delivered them to Gary Warren Bauer the same day; Mr. Bauer deposited them on November 2, 1988. Attached hereto as Exhibit F are the documents relating to the checks solicited by Gregory Barnhill.

As with the other checks, Congresswoman Bentley did not provide Sharon Hornberger with the occupation or employer of the contributors or the date on which she received the contributions.

2 0 0 4 0 8 1 - 5 3 6

INTERROGATORY NO. 3.

Identify the persons(s) who added the notation "CCRCCFA" to the contribution checks from Daniel Oliver, Shaukat A. Ashai, Tariq Mohmood, Parvez Shah, Ann McLaughlin, Peter Zourdos, June Abel, James P. Goldsmith, Andrew Manos, Kenneth Burke, Robert Barnhill, Joseph Payne, and John J. Foster, Jr.

RESPONSE TO INTERROGATORY NO. 3.

Congresswoman Bentley does not know who added the notation "CCRCCFA" to the contribution checks listed in the Interrogatory. As is reflected on Exhibit A, the notation did

not appear on the checks when they left Congresswomn Bentley's possession. Exhibit A consists of photocopies of the checks made by Sandie Morgan, Congresswoman Bentley's secretary, before the checks were delivered to Sharon Hornberger on November 1, 1988. The notation, "given to Sharon Hornberger on November 1, 1988, $10,300," is in Ms. Morgan's handwriting.

INTERROGATORY NO. 4.

Identify all persons known to you who handled in any way contributions for the Victory '88 program or the Bush/Quayle campaign made by the persons on the attached list.

RESPONSE TO INTERROGATORY NO. 4.

Congresswoman Bentley's knowledge concerning the chain of custody of the checks at issue is set forth in response to Interrogatory No. 2.

INTERROGATORY NO. 5.

State whether you requested that the Carroll County Republican Central Committee Federal Account be made available for the deposit and disbursement of contributions in connection with the Victory '88 program or the Bush/Quayle campaign. If so, describe the circumstances regarding the communication(s) and identify the date and person with whom such communication(s) occurred.

RESPONSE TO INTERROGATORY NO. 5.

Congresswoman Bentley did not request that the Carroll County Republican Central Committee Federal Account be made available for the deposit and disbursement of contributions to the Bush/Quayle '88 campaign.

With respect to the Victory '88 Program, on or about October 19, 1988, Congresswoman Bentley asked Sharon Hornberger, the Chairman of the Carroll County Republican

Central Committee, if the Carroll County Federal Account could be used for the receipt and disbursement of donations to Victory '88. Congresswoman Bentley informed Ms. Hornberger that she and Mr. Taylor were raising money for the Victory '88 Program and that they would decide the affiliated account into which the funds would be deposited.

Congresswoman Bentley requested Ms. Hornberger to inform only those members of the Carroll County Central Committee who had supported George Bush for President in the primary campaign. Congresswoman Bentley made this request because the Central Committee members who had supported other candidates were demonstrably not as committed to a Republican victory in the general election because their candidate was not leading the ticket. For strategic reasons, Congresswoman Bentley did not want the Dukakis campaign to learn of the account outside of the normal FEC reporting process.

Congresswoman Bentley delivered three groups of checks to Sharon Hornberger for deposit in the Carroll County federal account. The deliveries were made on October 28, 1988, November 1, 1988, and November 10, 1988.

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INTERROGATORY NO. 6.

State whether you directed the disbursement of any funds from the Carroll County Republican Central Committee Federal Account and, if so, identify the disbursements you so directed.

RESPONSE TO INTERROGATORY NO. 6.

Beginning December 14, 1988, Congresswoman Bentley presented certain bills to Sharon Hornberger for payment by the

Carroll County federal account. The payments that Congresswoman Bentley requested Ms. Hornberger to make are as follows:

1. December 14, 1988: Payment to Ambassador John Gavin ($2,012.68). This payment reimbursed Ambassador Gavin for travel expenses to the Kingdon Gould fundraiser for Victory '88.

2. December 14, 1988: Payment to Admiral Limousine Service ($460.50). This payment represented limousine service for Ambassador Gavin in connection with the Kingdon Gould fundraiser for Victory '88.

3. December 30, 1988: Payment to International Limousine Service ($500.00). This payment was a deposit for bus service to be provided to the Maryland delegation for the Inauguration.

4. November 7, 1988: Contribution to the Bentley Re-Elect Committee ($1,000). Similar contributions were made to the leading Republican candidates in Maryland, excepting, however, the presidential ticket. Using local party accounts, Congresswoman Bentley and Richard Taylor decided to direct contributions to the following candidates:

Alan Keyes -- United States Senate;

Wayne Gilchrest -- Congress, First Congressional District;

Connie Morella -- Congress, Eighth Congressional District;

Ross Pierpont -- Congress, Third Congressional District.

5. January 27, 1989: Payments to Leslie Jacoby ($2,200) and Marge Newman ($1,200). Ms. Jacoby and Ms. Newman had provided computer services to Victory '88 and Republican entities.

6. January 1989: Payment to Leslie Jacoby ($432.00). This payment was for computer supplies.

7. February 1989: $5,000 transfers were made to the federal account of the Baltimore City Central Committee and the Baltimore County Central Committee. These payments were transfers to affiliated local party committees.

8. April 1989: $1,067 paid for postage. The postage is being used in connection with mailings for Republican party building activities.

INTERROGATORY NO. 7.

Describe the role and participation, if any, by Bush/Quayle '88 in the soliciting, receipt, deposit, and disbursement of the contributions made by the persons on the attached list.

RESPONSE TO INTERROGATORY NO. 7.

The Bush/Quayle '88 campaign played no role and did not participate in the solicitation receipt, deposit, and disbursements of the contributions at issue.

INTERROGATORY NO. 8.

List all other contributions you received and forwarded with respect to the Victory '88 program or the Bush/Quayle campaign together with the identity of each contributor, the date you received each contribution, the date you forwarded each contribution, and to whom you forwarded each contribution.

RESPONSE TO INTERROGATORY NO. 8.

Congresswoman Bentley did not receive and forward any contributions for the Bush/Quayle '88 campaign during the relevant time.

Congresswoman Bentley did not keep records of all Victory '88 contributions that she received and forwarded during the relevant time. In general, it was her business practice to forward checks within a few days of receiving them. She normally did not make copies of the checks and she usually passed them along without documentation concerning the contributions. If a check was made payable to (or intended for) Maryland Victory '88, Congresswoman Bentley would mail or deliver it to the State Party. If a check was payable to a particular local party committee, she (with the sole exception of the Jayne Plank check) forward it to the applicable Treasurer. Consistent with the proceedures outlined in the Answer to Interrogatory No. 2, Congresswoman Bentley directed checks payable to "Victory '88" where she felt the funds could best be used to carry out the Victory '88 Program.

INTERROGATORY NO. 9.

For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state all reasons why each such contribution was forwarded to a committee or person other than the Republican State Central Committee of Maryland.

RESPONSE TO INTERROGATORY NO. 9.

All such contributions were forwarded by Congresswoman Bentley to federal accounts affiliated with the State Party and

were used for activities consistent with the objectives of the Victory '88 Program.

Congresswoman Bentley was dissatisfied with the performance of the State Party Chairman in carrying out Maryland Victory '88 (the State Party's Program). For example, using Maryland Victory '88 funds, the State Chairman and his staff distributed a mass mailing concerning the "Willie Horton" issue. This mailing provoked censure from candidate George Bush, Campaign Chairman James Baker, and the national, state, and local media. Because of this adverse publicity, many people refused to contribute to the State Party for fear that their donations would be misused.

In addition, the State Chairman and his staff had demonstrated no fundraising ability, even prior to the Willie Horton letter. Congresswoman Bentley solicited contributions that she could be certain would be directly employed for Victory '88 activities that she approved of.

It was Congresswoman Bentley's understanding that contributors who were solicited on her behalf were informed that their contributions would be turned over to her and used as she considered appropriate. Thus, the contributions were not intended for the State Party. At no time did Congresswoman Bentley divert to local party accounts contributions payable to "Maryland Victory '88" or otherwise withhold contributions that, to her knowledge, were intended for the State Party.

As stated previously, Congresswoman Bentley also believed that from a strategic standpoint, the Dukakis Campaign would expect all Victory '88 funds to be channeled through the State Party's federal account. Thus, Congresswoman Bentley anticipated that the Dukakis campaign might plan its strategy based upon that information. By channeling some funds through affiliated committees, Congresswoman Bentley hoped to prevent the possibility that the Dukakis Campaign would flood Maryland with a large influx of money during the last part of the campaign. At no time, however, did Congresswoman Bentley delay forwarding contributions to the applicable local party Treasurer. At no time did she request anyone soliciting contributions on her behalf to delay forwarding contributions.

INTERROGATORY NO. 10.

For each contribution you handled that was not forwarded to the Republican State Central Committee of Maryland, state whether the contributor explicitly instructed you to forward it to another committee or person or whether you explicitly informed such contributor that his or her contribution would be forwarded to another committee or person.

RESPONSE TO INTERROGATORY NO. 10.

See Answer to Interrogatory No. 9.

REQUEST FOR PRODUCTION OF DOCUMENTS.

Provide copies of all documents relating to your responses to the above questions.

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS.

See Exhibits A-F. Congresswoman Bentley has provided copies of all documents concerning the fourteen checks at issue.

Respectfully submitted,

Benson Everett Legg

Benson Everett Legg
Venable, Baetjer and Howard
1800 Mercantile Bank and
Trust Building
Two Hopkins Plaza
Baltimore, Maryland 21201
(301) 244-7404

Attorney for Congresswoman
Helen Delich Bentley

2304115544

I hereby declare and affirm under the penalties of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Helen Delich Bentley

Helen Delich Bentley

P00403115545

8833R

Given to Sharon Hornsberger on

11-01-88

$10,300

10-7 19 88 1933

$ 150.00

DOLLARS

James O. Smith

1933

LEONARD L. ABEL
JUNE K. ABEL

September

PAY TO THE ORDER OF Victory 88

One hundred and 00 DOLLARS

Montgomery County Bank

FOR

⑈000817⑈ ⑆055002236⑆ 01 007335 06⑈

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/520 001

PAY TO THE ORDER OF VICTORY 88 $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST COMPANY OF MARYLAND BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

⑆052000161⑆ ⑈301 57630⑈ 0631

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88 7-10/520 0387

PAY TO THE ORDER OF Victory 88 $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21203

FOR Bush for President Joseph and Susan Payne

⑆052000168⑆ 0551000 1039254⑈

EXHIBIT A

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10- 19 85

PAY TO THE ORDER OF Victory 88 $ 150.00

one hundred fifty DOLLARS

First National Bank of Maryland

FOR

James O. Goldsmith

:052100408: 059-0270 8" 1933

LEONARD L. ABEL
JUNE K. ABEL

817

September 24 19 58 00

PAY TO THE ORDER OF Victory 88 $ 100.00

One hundred 00 DOLLARS

Montgomery National Bank

FOR

Abel

"000817" :055002231:"01-007335-06"

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/320 001

PAY TO THE ORDER OF VICTORY 88 $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST COMPANY OF MARYLAND BALTIMORE, EASTLAND 21202

MEMO CONTRIBUTION

:052000016: "301-57630" 0631

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88 7-16/520

PAY TO THE ORDER OF Victory 88 $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21203

FOR Bush for President

Joseph and Susan Payne

:052000168: 0551000 1039254"

>0040811547

KENNETH J. BURKE
108 PARK LANE
BALTIMORE, MD 21210

10/6/88 0190

PAY TO THE ORDER OF Victory '88 $ 100.00

One Hundred and 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO

⑆052000168⑆0190⑈000 1137814⑈

ROBERT B. OR MARGARET K. BARNHILL
6607 WEYMOUTH COURT PH 301-377-6662
BALTIMORE, MD 21212

1811

10-1 1988

Pay to the Order of Victory '88 $ 100.00

One hundred Dollars

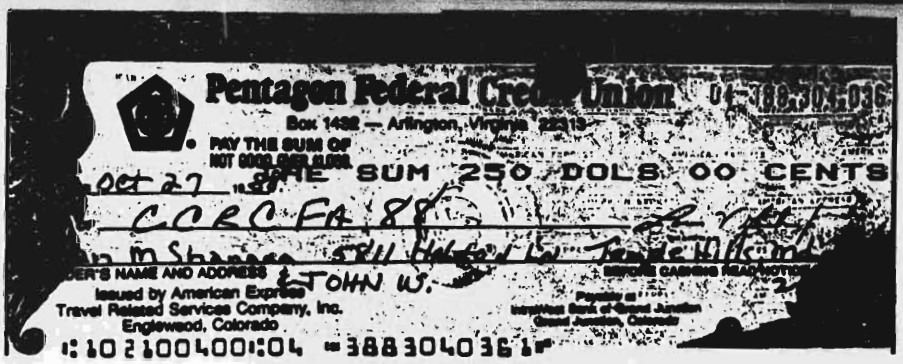
South Carolina National Bank
Hilton Head Island, S.C. 29928

For

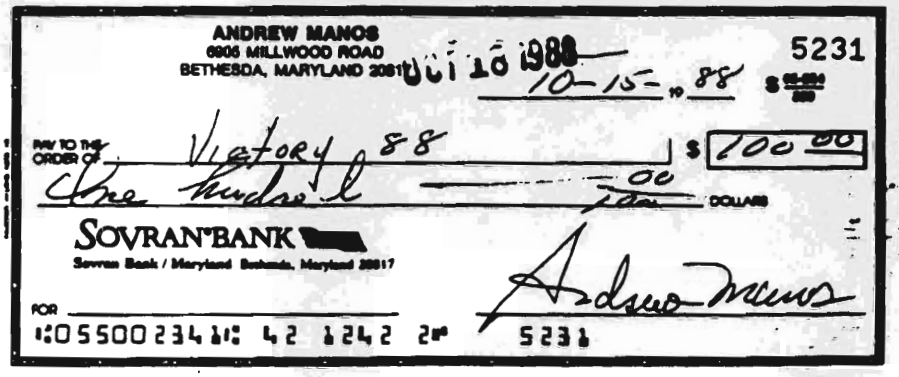
⑆053200191⑆18117⑈32 1500571⑈

$850 - from Barnhill Group

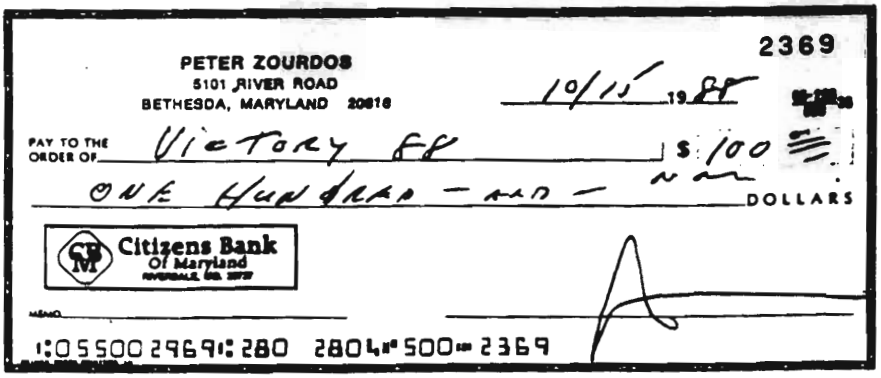
⑆040311548



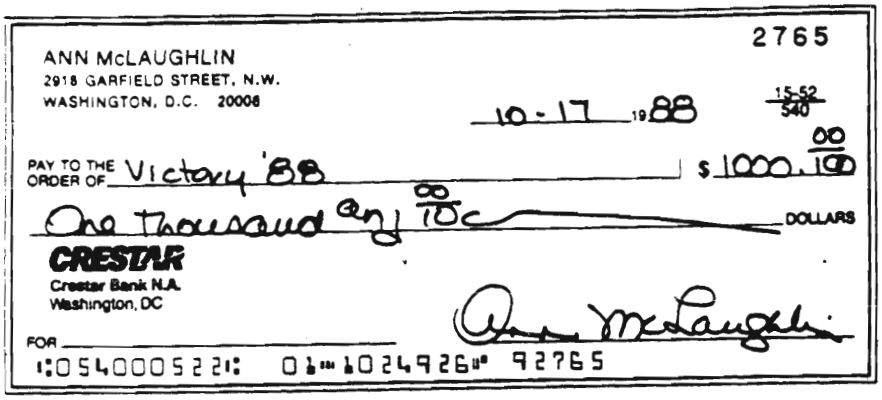
Pentagon Federal Credit Union
Box 1432 — Arlington, Virginia 22210
PAY THE SUM OF NOT OVER $250.00
THE SUM 250 DOLS 00 CENTS
Oct 27 19 88
CCRC FA 88
Issued by American Express Travel Related Services Company, Inc.
Englewood, Colorado
:102100400:04 = 388304036



ANDREW MANOS
6906 MILLWOOD ROAD
BETHESDA, MARYLAND 20817
OCT 10 1988
5231
10-15-88
PAY TO THE ORDER OF Victory 88 $ 100 00
One Hundred 00 DOLLARS
SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817
FOR
Andrew Manos
:055002341: 42 1242 2nd 5231



PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816
2369
10/15 1988
PAY TO THE ORDER OF Victory 88 $ 100 00
ONE HUNDRED AND NO DOLLARS
Citizens Bank Of Maryland
MEMO
:055002969: 280 2804# 500= 2369



ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008
2765
10-17 1988
15-52/540
PAY TO THE ORDER OF Victory '88 $ 1000.00
One Thousand and 00/100 DOLLARS
CRESTAR
Crestar Bank N.A.
Washington, DC
FOR
Ann McLaughlin
:054000522: 01= 1024926# 2765

2004031549

PARVEZ SHAH, M.D.
SIRJEES SHAH
4406 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 1988

Pay to the Order of Victory 88 $ 1,000.00

One Thousand 00 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

Parvez Shah

⑆055000770⑆ 1272 000294066⑈

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL. 301-730-6943
11360 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11- 19 88

PAY TO THE ORDER OF VICTORY 88 $ 1000 00

One thousand —— no/100 DOLLARS

COLUMBIA OFFICE
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Election contribution Bank.

Shaukat Ashai

⑆052000168⑆ 0735 00 7894 7108⑈

TARIQ MAHMOOD, M. D.
REAMA MAHMOOD
10701 BALANTRE LANE
POTOMAC, MD 20854

326

10 - 11 - 19 88

PAY TO THE ORDER OF VICTORY 88 $ 1000/—

One Thousand dollars DOLLARS

Equitable
PrivateBanking
Equitable Bank, N.A.
Baltimore, Maryland 21201

FOR

Tariq Mahmood

⑆055003162⑆ 0326 882 0089 4⑈

DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 88 6182

PAY TO THE ORDER OF Victory '88 $ 1000 00

One thousand and NO 100 DOLLARS

CHEMICALBANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO

Daniel Oliver

⑆021000128⑆ 967 203139⑈ 6182

2450

2 2 2 4 0 3 1 1 5 5 0

FRANKLIN P. PERDUE
P. O. BOX 1537
SALISBURY, MARYLAND 21801

4732

10-20 19 88 55-40/521

PAY TO THE ORDER OF Victory 1988 $ 1,000 00

One Thousand and 00/100 DOLLARS

First National Bank of Maryland
SALISBURY, EASTLAND ACCOUNTING CENTER

FOR

Franklin P. Perdue

:052100408: 318=4237 4# 4732

BENTLY RE-ELECT COMMITTEE INC. 88
P. O. BOX 10619
TOWSON, MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 1,000 00

One Thousand 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
2600 YORK ROAD
LUTHERVILLE-TIMONIUM, MARYLAND 21093 64

Check from Franklin Perdue Deposit in error Margaret E. Mullen

#0000 1078# :052000618: #625729#

490

PERDUE
FARMS INCORPORATED

P. O. Box 1537
SALISBURY, MARYLAND 21801-1537

SALISBURY MD. OCT 28 '88 U.S.POSTAGE 025

P0104081155I

Congresswoman Helen Bentley

Box 10619

Towson, MD 21285-0619

LAWRENCE R. RACHUBA

2642

10-25 19 88 7-10/520

PAY TO THE ORDER OF C.C.R.C.E.A - '88 $ 1000 00

One thousand 00/xx DOLLARS

MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND

FOR _____ Lawrence R Rachuba

:05 2000 168: 2642 000 9039 624

Administrative Offices
700 Fairmount Avenue
Towson, Maryland 21204

THE DECHIARO-RACHUBA GROUP

Mrs. Helen Bentley
Congresswoman
408 Chapelwood Lane
Lutherville, Maryland 21093

LEONARD A. KRAUS
RUTH N. KRAUS
10901 JUNIPER ROAD
KINGSVILLE, MARYLAND 21087

3877

10-23 19 88 7-10/520

PAY TO THE ORDER OF C.C.R C+A-88 $ 1000.00

One thousand 00/100 DOLLARS

MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND

FOR Book for President Ruth N Kraus

:05 2000 168: 3877 000 1 3 1 6 1 4

Victory '88

October 21, 1988

Mr. Dick Taylor
Steptoe and Johnson
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Dick:

Enclosed is a $1,000 check for the District's Victory '88 federal account from Daniel Oliver. His address appears on his check, in the event you wish to send thanks.

Please call if you have any questions.

Sincerely,

Fred Bush

2004031553

EXHIBIT B

Daniel Oliver
3105 Woodley Road, NW
Washington, D.C. 20008
Lawyer, Chairman, Federal Trade Commission

2034031554

George Bush for President

Dick —

A couple of checks —

GHW Bush

PAID FOR BY GEORGE BUSH FOR PRESIDENT

2004031155

ANDREW MANOS
6805 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

5231

10-15- 88

PAY TO THE ORDER OF Victory 88 $ 100 00

One Hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR

Andrew Manos

1:055002341: 42 1242 2" 5231

PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816

2369

10/15 19 88

PAY TO THE ORDER OF Victory 88 $ 100 00

ONE HUNDRED AND NO/100 DOLLARS

Citizens Bank Of Maryland
RIVERDALE, MD. 20737

MEMO

EXHIBIT C

VICTORY '88

Republican National Committee

Dick
Here a check for
the Sec. of Labor —
Be sure her staff gets
hype thanks — Thks! —

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 1988

15-52/540

PAY TO THE ORDER OF Victory '88 $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

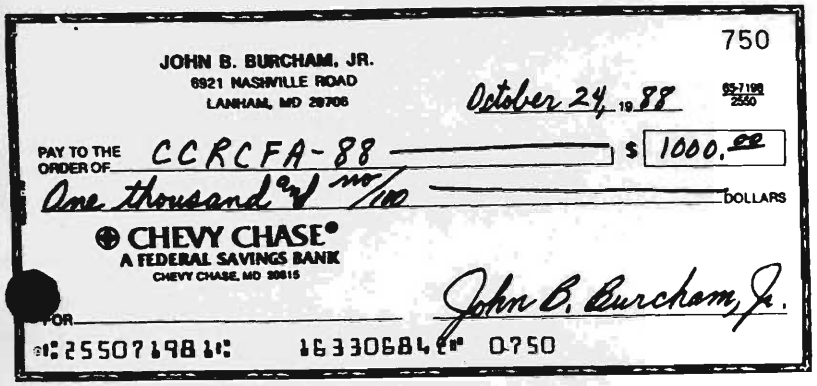
Ann McLaughlin

⑆054000522⑆ 01⑈1024926⑈ 92765

D J J 4 0 3 1 1 5 5 6

EXHIBIT D

EXHIBIT E



750

JOHN B. BURCHAM, JR.
6921 NASHVILLE ROAD
LANHAM, MD 20706

October 24, 1988

PAY TO THE ORDER OF CCRCFA-88 $ 1000.00

One thousand and no/100 DOLLARS

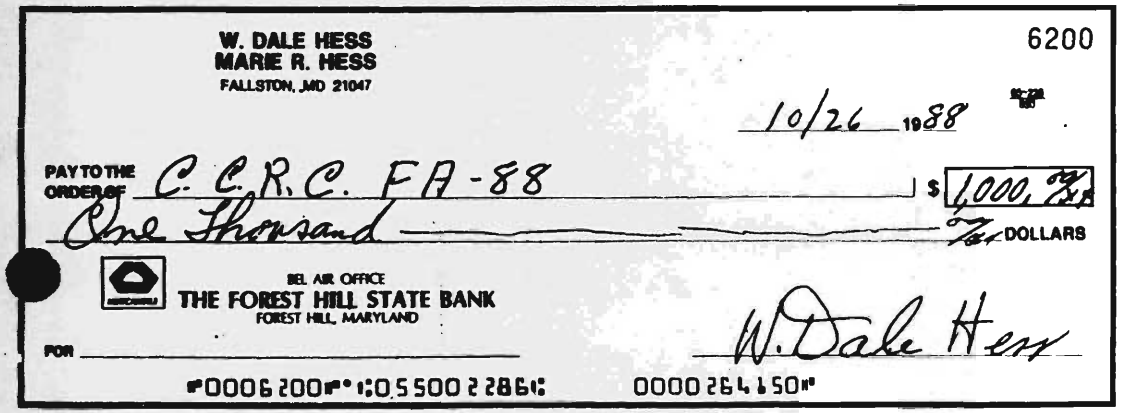
CHEVY CHASE
A FEDERAL SAVINGS BANK
CHEVY CHASE, MD 20815

FOR _____ John B. Burcham, Jr.

⑈255071981⑈ 1633068462⑈ 0750

John B. Burcham, Jr. (301) 552-2086
6921 Nashville Rd.
Lanham, Md. 20706

Employment
Executive Director
National Liquor Stores Association, Inc.
5101 River Rd., Suite 108,
Bethesda, Md. 20816
(301) 656-1494



6200

W. DALE HESS
MARIE R. HESS
FALLSTON, MD 21047

10/26 1988

PAY TO THE ORDER OF C.C.R.C. FA-88 $ 1,000.00

One Thousand DOLLARS

BEL AIR OFFICE
THE FOREST HILL STATE BANK
FOREST HILL, MARYLAND

FOR _____ W. Dale Hess

⑆0006200⑆ ⑆055002286⑆ 0000264150⑈

10-28-88 Given to Susan Warnberger by HDB $3,900.00

900408115 57

JAYNE H. PLANK

153

10/ 88

PAY TO THE ORDER OF FS Victory 88 $ 500.00

Five hundred + 00/100 DOLLARS

CITIZENS BANK AND TRUST COMPANY MARYLAND
RIVERDALE, MD. 20737

1000- Fredericksburg Rd Jayne H Plank

⑆055002969⑆ 4064⑈000⑈0153

Kensington MD 20895-

WILLIAM R. ROTHE
GAY FREDERICK ROTHE
4000 TUNLAW ROAD, N. W., NO. 507
WASHINGTON, D.C. 20007

2825

10/23/88 19 7-16 6478 820

PAY TO THE ORDER OF "VICTORY '88" $ 200—

TWO HUNDRED + NO/100 DOLLARS

TEN LIGHT STREET OFFICE 601
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR

⑆052000168⑆ 2825 00 16240814⑈

GORDON L. SMITH
BARBARA SMITH
13711 EAST DEVONFIELD DRIVE
BALDWIN, MARYLAND 21013

3848

October 21 19 88 7-60 820

PAY TO THE ORDER OF Victory '88 $ 200.00

TWO HUNDRED AND 00/100 DOLLARS

Equitable Equitable Bank, N.A. Baltimore, Maryland

FOR CONTRIBUTION

⑆052000896⑆ 3848 798 0088 7⑈

HENRY A. ROSENBERG, JR.

SIGNET BANK Maryland
Baltimore MD

2759

Oct. 24 19 88 17-60 820

PAY TO THE ORDER OF Victory '88 $ 1,000.00

One thousand and 00/100---------- DOLLARS

FOR

⑈CO 2759⑈ ⑆052000066⑆ ⑈306⑈07956⑈

ntley
an
85-9944

$1,200 $50 NCH corpor: 6
from Greg Barnhill
delivered to V. Love
From Carol Hirshberg

this he
to pay
tion
ded?

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10-7 19 88 55-40/521 016

PAY TO THE ORDER OF Victory 88 $ 150.00

one hundred fifty ——— DOLLARS

First National Bank of Maryland
SALISBURY, MARYLAND ACCOUNTING CENTER

FOR _____ Jas O. Goldsmith

⑆052100408⑆ 059⑈0270 8⑈ 1933

JOHN J. FOSTER JR.
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/520 001

PAY TO THE ORDER OF VICTORY 88 $ 200.00/xx

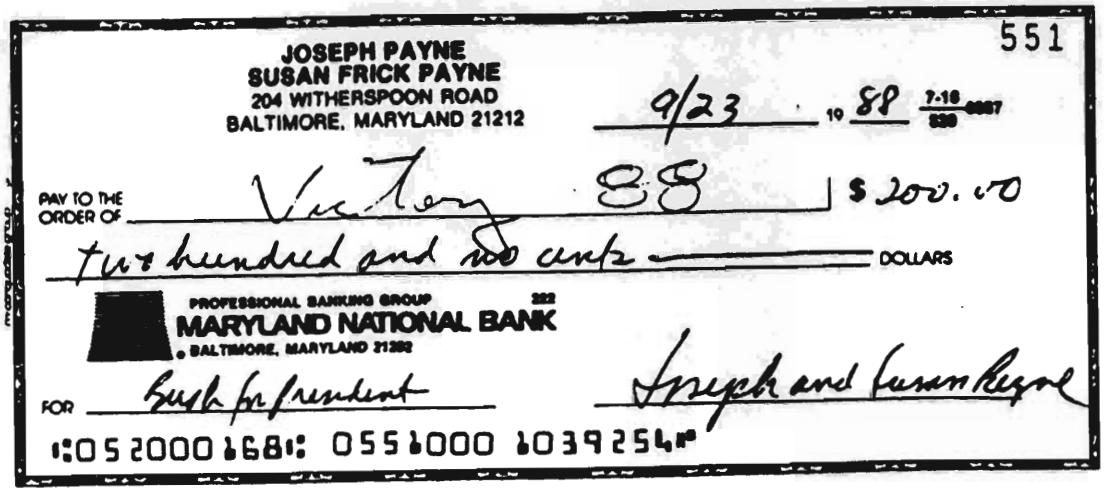
TWO HUNDRED AND 00/xx ——— DOLLARS

UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

⑆052000016⑆ ⑈301⑈57630⑈ 0631

EXHIBIT F



551

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

9/23 19 88 7-16/520

PAY TO THE ORDER OF Victory 88 $ 200.00

two hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR Bush for president Joseph and Susan Payne

⑆052000168⑆ 0551000 ⑈039254⑈

2004031150

ROBERT B. OR MARGARET K. BARNHILL
6607 WEYMOUTH COURT PH 301-377-5952
BALTIMORE, MD 21212

1811

10-1 1988 67-1/532

Pay to the Order of Victory 88 $ 100.00

One hundred 00 Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For R B Barnhill

⑆053200191⑆ 1811 ⑈32 ⑈500571⑈

KENNETH J. BURKE
103 PARK LANE
BALTIMORE, MD 21210

10/6/1988 0190

7-16/520

PAY TO THE ORDER OF VICTORY '88 $ 100.00

ONE HUNDRED AND 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO Kenneth J Burke

⑆052000168⑆0190 ⑈000 ⑈37843⑈

LEONARD L. ABEL
JUNE K. ABEL

817

65-223
550 01

September 24 19 55

PAY TO THE ORDER OF Victory 55 $ 100 00

One Hundred DOLLARS

Montgomery National Bank

J. K. Abel

⑈000817⑈ ⑆055002231⑆ 01 007335 06⑈

056
040

OGC 4189

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT -5 AM 11:01

ANN McLAUGHLIN
2100 M Street, NW, Suite 500
Washington, D.C. 20037

October 4, 1989

MUR 2936

89 OCT -5 PM 1:00

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Mr. Noble:

In response to your Interrogatories and Request for Production of Documents, I submit the following:

1. Provide all documents in your possession relating to your check number 2765, dated October 17, 1988, made payable to "Victory '88 CCRCCFA" and drawn on your account.

A photocopy of check number 2765 is attached.

2. State to whom and on what date you delivered or sent this check and the method of delivery or sending.

Check number 2765 was mailed to the attention of Fred Bush at the Republican National Committee, presumably on or about the date of the check, October 17, 1988.

3. Describe in detail the circumstances leading up to and surrounding your making of the contribution represented by this check.

The check represented a personal decision to make a contribution to Vice President Bush's campaign. There are no other circumstances surrounding this contribution.

4. State the purpose for which you made this contribution and to what entity you understood you were making this contribution at the time you made it and describe the basis for such understanding.

2940115562

The contribution was the result of a personal decision to contribute to Vice President Bush's campaign and, because I spoke with no one about this contribution, I assume it was general, common knowledge that such a contribution could be made to the RNC and "Victory '88".

5. State whether you have had any communication or discussions with any person(s), other than your immediate family or employees, regarding this contribution. If so, identify with whom and when you had each communication or discussion and describe the nature of each communication or discussion. Provide all documents in your possession relating to all such communications or discussions.

I had no such communication.

6. State whether or (sic) you wrote "CCRCCFA" on the "pay to the order of" line of the check identified in question 1. If you did not, identify who wrote this notation on the check.

I did not write "CCRCCFA" on the "pay to the order of" line of check number 2765 and I have no idea who made that notation.

I swear, by my signature, that these responses are true to the best of my recollection.

Sincerely,

Ann McLaughlin

2140315563

2765

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

10-17 19 88

15-52
540

PAY TO THE ORDER OF Victory '88 ECRcCFA-88 052 00 0275 00 $1000.00

One thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

Ann McLaughlin

FOR

⑆054000522⑆ 0⑈⑈024926⑈ 92765 ⑈0000⑈00000⑈

NO '88 03

056001079

10-0107

0520-0087-S
0520-0027-S
1028014G3 11-02-SS

JJJ4038115164

Republican
National
Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
J. Courtney Cunningham
Deputy Chief Counsels

October 6, 1989

The Honorable Danny L. McDonald
Chairman
Federal Election Commission
Washington, D.C. 20463

RE: Matter Under Review 2936

Dear Chairman McDonald:

Enclosed please find the response of Mary Matalin, Chief of Staff of the Republican National Committee, to the Federal Election Commission's Interrogatories and Request for Production of Documents in the above-captioned matter.

Sincerely,

Benjamin L. Ginsberg

BLG:jd
Enclosures

cc: Jeffrey Long,
Office of the General Counsel

Dwight D. Eisenhower Republican Center • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8638
Telex: 701144 • FAX: 863-8820

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

RESPONSE TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Mary Matalin, Chief of Staff of the Republican National Committee (RNC), and Director of its Victory '88 program, hereby answers the Federal Election Commission's Interrogatories and Request for Production of Documents as follows:

1. Describe the Victory '88 program and the Republican National Committee's role and activities with respect to the Victory '88 program and the Bush/Quayle campaign.

RESPONSE: Victory '88 was a nationwide program of the Republican National Committee (RNC) that assisted state and local party organizations with their efforts to provide volunteer support on behalf of the entire Republican ticket in the 1988 November general election. Victory '88 was conducted under the direction of the RNC Chairman and staff as a party building program benefiting all Republican candidates by promoting the volunteer-intensive activities set forth in 2 U.S.C. 431(8)(B)(v), (x) and (xi). While Victory '88 certainly consulted with Republican campaigns, including Bush/Quayle, Victory '88 was separate from any and all campaigns.

The nationwide Victory '88 program assisted state parties in raising funds for both their federal and state accounts and provided advice on the non-allocable party building programs that could be conducted pursuant to the Act. Detailed descriptions of the Victory '88 program from E. Mark Braden, Chief Counsel of the RNC during the 1988 campaign, are attached as Exhibit A.

2. Describe the relationship and role between the Republican National Committee and the Victory '88 program with respect to the Republican State Central Committee of Maryland, Victory '88 committees established in Maryland, and the Bush/Quayle campaign in Maryland, including Representative Helen Delich Bentley and Richard P. Taylor.

RESPONSE. Victory '88, a program of the RNC, actively advised and aided all states in establishing Victory '88 programs to conduct various party building activities on behalf of Republican candidates. As part of this party building program in all states, including Maryland, there was coordination and discussion with local officials and personnel of various party organizations and the Bush/Quayle campaign as well as with other campaigns on the federal, state and local levels.

Victory '88's role was to advise and assist the Republican State Committee of Maryland as well as other Republican Party organizations in the state in establishing and operating their party building programs. Specifically, this advice and

assistance included offering technical organizational advice on programs; providing generic copy for Republican brochures, sample ballots, palm cards, and voter turnout materials; helping to develop scripts for party phone banks; advising on the necessary allocation of costs between candidates benefiting from the phone banks; and helping raise the funds needed to conduct these programs through a Maryland-specific mail campaign and through fundraising events. In addition, funds were transferred to the Maryland Party and Free State Victory '88 by the RNC pursuant to 11 C.F.R. 110.3(c).

There were meetings and telephone calls throughout the period between July 1, 1988, and Election Day between employees of the RNC, state and county parties, and various state and federal campaigns to discuss the Victory '88 party building programs. There was frequent contact with both Representative Helen Delich Bentley, RNC National Committeewoman and Maryland Bush/Quayle chairman, and Richard P. Taylor, RNC National Committeeman and Victory '88 treasurer for Maryland.

3. Identify all personnel at the Republican National Committee with overall or operational responsibility or role regarding the Victory '88 program and all such personnel who performed any liaison with the Republican State Central Committee of Maryland, Victory '88 committees in Maryland, the Bush/Quayle campaign in Maryland including Representative Helen Delich Bentley and Richard P. Taylor.

RESPONSE: All of the approximately 425 employees at the RNC between July 1, 1988, and Election Day were involved

operationally with the party building programs conducted as part of the Victory '88 program. A staff roster, dated October 31, 1988, is attached as Exhibit B. Victory '88 was a cooperative venture between the RNC and Republican organizations in all 50 states. The program was conducted under the general leadership of Chairman Frank J. Fahrenkopf, Jr., and headed by Victory '88 Director, Mary Matalin. Specific liaison with Republican operatives and entities in Maryland was handled primarily by Regional Political Director John Long, his assistant Lisa Friel, and Victory '88 staff members, Sandy Baxter and Tom Labrecque. In addition, fundraising advice and assistance was provided by Fred Bush and Margaret Alexander, both of whom were consultants to the RNC for Victory '88.

4. Describe the role and activities of the Republican National Committee and its personnel regarding the solicitation, receipt, transmittal, and other handling of contributions for the Victory '88 program that were sent to persons in Maryland, and identify with whom in Maryland the Republican National Committee and its personnel coordinated such activities.

RESPONSE: In its role as a national political party committee, the RNC, through its Victory '88 program, assisted state parties in raising the funds needed to conduct party building activities in the 1988 campaign. Specifically, the RNC sent two fundraising mailings into all 50 states and the District of Columbia. One mailing, attached as Exhibit C, was signed by then-Vice President George Bush (while the RNC files do not

contain a Maryland-specific mailing, Exhibit C is an example of the Bush mailing and is exactly like the mailing in Maryland with the exception that the states are different). The second mailing, attached as Exhibit D, was signed by then-President Ronald Reagan. Invoices for the postage for the Maryland mailings and copies of the reimbursements by the Maryland Republican Party to the RNC for this postage are attached as Exhibit E. These mailings were state specific. The lists for each mailing were prepared by the individual state parties from among their own donors and from lists of contributors to the Bush '88 campaign in that state. Each state's recipients were asked to contribute directly to their own state party's Victory '88 program's federal account. All responses went directly to the state party in envelopes supplied as part of the mailing. RNC personnel were active in the design and production of these mailings, but the state parties paid for the postage for these mailings by reimbursing the RNC for postage costs attributable for their states (See exhibit E, supra).

The RNC was not listed as the return address on any response device for a Victory '88 mailing. The two mailings were the only Victory '88 mail solicitations by the RNC. The policy of the RNC with respect to Victory '88 was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several ways. Affidavits detailing

this policy are attached as Exhibit F. If donors wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where they thought their funds might be better utilized, they were given the appropriate information for such contributions. All members of the Victory '88 finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88." Id.

When checks made out to "Victory '88" were sent to the RNC by a contributor, it was the RNC's policy to make an attempt to contact these contributors to determine the intended recipient. When the contributor could be reached, the procedure paralleled that set out in the previous paragraph. If the contributor could not be reached, and since the Bush and Reagan mailings were the RNC's only mail solicitations for the Victory '88 program, it was the RNC's policy to send the check to the state party of the contributor's home state, as determined by the address on the check or return address on the contributor's envelope. The policy of the Victory '88 program was that contributors from the District of Columbia who sent checks to the RNC made out to "Victory '88" were contacted and asked to which state party they wished their checks directed. The direction of the donor was then followed. Id.

It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law. Id. The RNC kept no records of such contributions since the mailing was designed so that the RNC would not receive Victory '88 contributions or responses to the mailing. Any checks made payable to "Victory '88" that came to the RNC unsolicited and could not be attributed to one of the nationwide mailings were deposited into an RNC account if the donor could not be contacted to determine if they had intended to direct their contribution to a specific state.

Any activities between the RNC and individuals in Maryland were handled either directly by Fred Bush or by Tom Labrecque working with Helen Bentley, Richard Taylor and Dan Fleming.

5. With respect to the attached list of persons, state whether the Republican National Committee or its personnel received contributions from any of these persons for the Victory '88 program and, if so, for each such contribution state the date of receipt by the Republican National Committee, the date the contribution was forwarded, and the identity of the person to whom each such contribution was forwarded.

RESPONSE: Four individuals on the attached list sent contributions through the RNC. Under the RNC policy described in response to Interrogatory 4, the $100 contributions from Peter Zordos and Andrew Manos were forwarded to Richard Taylor. The

$1,000 contributions from Ann Dore McLaughlin and Daniel Oliver came to the RNC and were also forwarded to Taylor. The RNC's records do not include the date of receipt for any of the contributions, nor the date they were forwarded to Taylor. These checks and cover notes from Fred Bush to Taylor accompanying the checks are included in response to Interrogatory 6 and Interrogatory 8 at Exhibit H.

6. State whether the Republican National Committee has had communications after the 1988 general election with any persons in Maryland regarding the handling of contributions for the Victory '88 program or has reviewed any records or reports with regard to such contributions. If so, identify each communication and review.

RESPONSE: The current Chief Counsel to the Republican National Committee, Benjamin L. Ginsberg, has been involved in discussions with a number of individuals in Maryland concerning post-election articles that appeared in the media involving the conduct of the Victory '88 program in Maryland and were sent to the RNC by individuals from Maryland. These media reports appeared in the context of a feud between factions of the Maryland State Party. They included allegations of improprieties that were the subject of discussions between Ginsberg and individuals in Maryland. The articles that prompted the discussions are attached as Exhibit G. Discussions were held with: Michael Burns, Maryland State Party Executive Director; Daniel Fleming, Maryland State Chairman; Daniel Oliver; Helen

Bentley; Richard Taylor, and Joseph Getty. During the course of these discussions, various records or reports were reviewed. These documents are attached as Exhibit H.

7. State whether the Republican National Committee received, transmitted, or otherwise handled contributions for the Victory '88 program from persons other than those on the attached list that were sent to persons in the State of Maryland. If so, state the number of such contributions so handled, the aggregate dollar amount of such contributions, and the identity of the person(s) to whom such contributions were forwarded.

RESPONSE: During the course of funding the Victory '88 program, those working on the Victory '88 program did discuss contributions to party committees in Maryland with prospective donors. Based on the recollections of Fred Bush, there may have been isolated instances where checks were sent to the RNC on behalf of Victory '88-Maryland or Free State Victory '88. A search of the RNC's records fails to confirm or deny any such transactions.

8. Provide copies of all documents relevant to your response to the above questions.

RESPONSE: All such documents are attached as Exhibits A through H.

Mary Mataln

Mary Mataln

9004081 1575

Republican
National
Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

September 6, 1988

TO: Republican National Committee Staff

FROM: Mark Braden

SUBJ: BUSH/QUAYLE CAMPAIGN

2004031576

I know I share with all employees of the RNC the fervent desire to assist in the election of George Bush as the next President of the United States.

Our enthusiasm to assist in this election, however, must be tempered with an understanding and compliance with the restrictions of federal law. The RNC and its employees may not provide services or goods to the Bush/Quayle campaign unless there is specific, prompt and fair compensation, or the cost of such goods or services is allocated against the party's general election coordinated expenditure limit.

All RNC personnel must understand that they are party and not campaign employees. Care must be taken to assure that everyone we work with outside the Committee understands whom we represent -- the RNC. Coordination and discussion of activities are appropriate with campaign officials and personnel, but direction and supervision must be provided exclusively by RNC personnel. Work product and services specifically for the Bush/Quayle campaign, or any other federal campaign, must be created and paid for by the campaign; not by RNC personnel or resources.

The Victory '88 program is designed to assist state and local party organizations with their effort to provide volunteer support to the Bush/Quayle campaign and the remainder of the Republican ticket. It is vital that all RNC staff understand that the Victory '88 program is a party program and not a

Dwight D. Eisenhower Republican Center • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8638
Telex: 701144 • FAX: 863-8820

Bush/Quayle campaign program. It is vital that all staff clearly express to any state and local party officials with whom they may deal that they are employed by the RNC and get their direction from the Chairman of the RNC and not direction from any campaign.

Victory '88 is a party program for all Republican candidates; not a program by or for only the Bush/Quayle campaign. Failure to abide by, and understand, these facts will result in prompt remedial steps.

If you should have further questions, of if I may be of additional assistance, do not hesitate to call my office.

EMB:jd

9004093115777

Republican
National
Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

June 8, 1988

TO: RNC Field Staff

THRU: Chris Bowman, Director
Political Operations

THRU: Mary Matalin, Director
Victory '88

FROM: Mark Braden

SUBJ: BUSH '88

I know I share with all field employees of the RNC the fervent desire to assist in the election of George Bush as our next President of the United States.

Our enthusiasm to assist in this election, however, must be tempered with an understanding and compliance with the restrictions of federal law. The RNC and its employees may not provide services or goods to the Bush '88 committee unless there is specific, prompt and fair compensation, or the cost of such goods or services is allocated against the party's general election coordinated expenditure limit.

All RNC personnel must understand that they are party and not campaign employees. Care must be taken to assure that

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Telex: 701144 • FAX: 863-8820

everyone the Field staff works with outside the Committee understands who the principal is that they represent -- that is the RNC. Coordination and discussion of activities are appropriate with campaign officials and personnel, but direction and supervision must be provided exclusively by RNC personnel. Work product and services specifically for the Bush campaign, or any other federal campaign, must be created and paid for by the campaign; not by RNC personnel or resources.

The Victory '88 program is designed to assist state and local party organizations with their effort to provide volunteer support to the Bush campaign and the remainder of the Republican ticket. It is vital that all RNC field staff understand that the Victory '88 program is a party program and not a Bush campaign program. It is vital that all field staff clearly express to any state and local party officials with whom they may deal that they are employed by the RNC and get their direction from the Chairman of the RNC and not direction from the Bush campaign.

Victory '88 is a party program for all Republican candidates; not a program by or for only the Bush campaign. Failure to abide by, and understand, these facts will result in prompt remedial steps.

If you should have further questions, of if I may be of additional assistance, do not hesitate to call my office.

EMB:jd

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Republican
National
Committee

VICTORY '88/STATE FEDERAL ACCOUNTS PROGRAM

A. The Victory '88 program involves the funding of accounts that are created within each state to assist with programs for federal candidates, i.e. Congressional, Senatorial and Presidential.

B. These Victory '88 or state federal accounts are separate from the state party operating accounts and will not be used for any other purpose than noted above.

C. The state federal accounts will fund such voter outreach programs as voter registration, voter list development, volunteer registration and materials, presidential phone banks, voter contact mail and ballot security. (See attached description of Victory '88 activities).

D. The RNC has assisted targeted states with start-up dollars, and is working closely with the state parties in designing programs that will help our presidential candidate, and where applicable our senatorial and congressional candidates to the best possible extent.

E. Individuals may contribute up to $5,000 through their personal checking account. Personal contributions to a state Victory '88 account count against an individual's $25,000 federal giving limit as the funds go towards influencing federal elections.

F. Certain states do allow corporate contributions and can be used in the following way:

> In some states, activities such as voter registration and get-out-the-vote programs can be paid for by both corporate dollars (which are deposited in state accounts) and federal dollars (personal checks deposited in the state federal account). All information gathered from these programs is made available not only to our federal candidates, but to state and local candidates as well.

G. These Victory '88 or federal accounts are vital to our presidential nominee, for voter outreach programs cannot be adequately funded by the presidential campaign

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with the amount of money allocated to his campaign by the federal government for the general election cycle.

A well-funded, mobilized state party will ensure that each and every voter is at the polls on November 8 to vote for not only our presidential candidate, but all GOP party candidates.

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Republican
National
Committee

E. Mark Braden
Chief Counsel

Michael A. Hess
Randall Davis
Deputy Chief Counsels

May 5, 1988

TO: Republican State Chairmen

FROM: E. Mark Braden

SUBJ: VOLUNTEER ACTIVITIES/VICTORY '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 Victory '88 Program is an effort to assist and encourage state and county committees to utilize these advantages. Victory '88 is a party program. A state party's Victory '88 program can be, and should be, conducted in cooperation with Republican candidates' campaigns, but must remain the party's program.

Victory '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.

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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 Victory '88, voter identification (ID), or get-out-the-vote (GOTV) phone bank specifically on behalf of the Presidential campaign.

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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.

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 <u>incidental</u> 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. <u>Hard/Soft Dollars</u>. 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 <u>classes</u> 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.

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 Victory '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 Victory '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

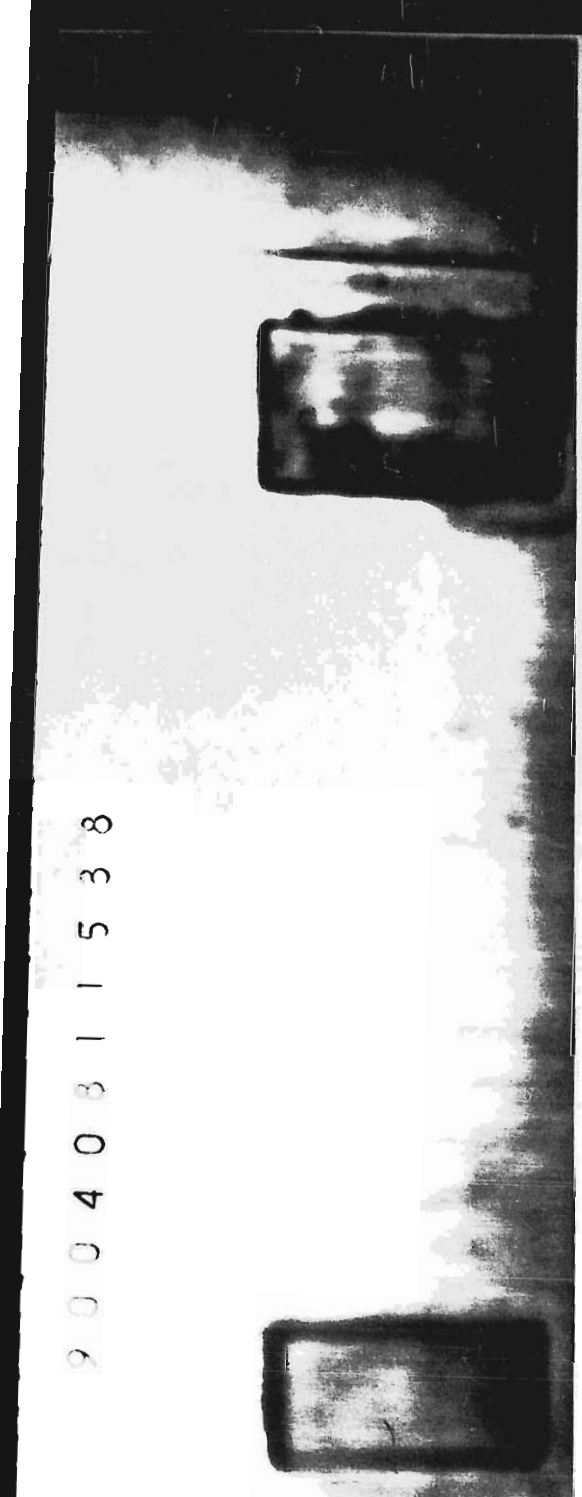
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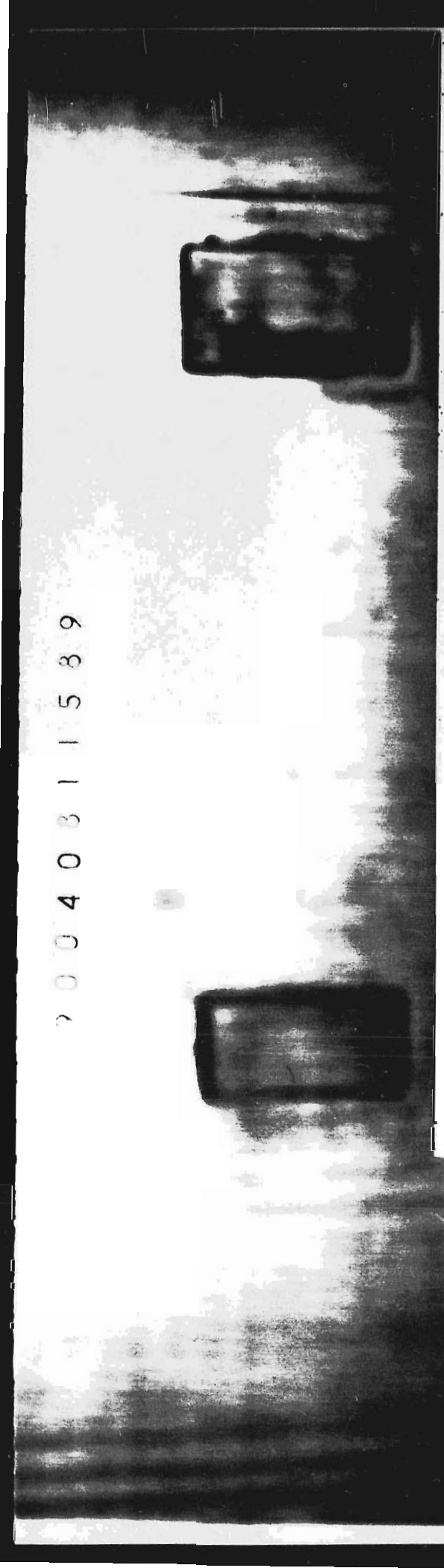


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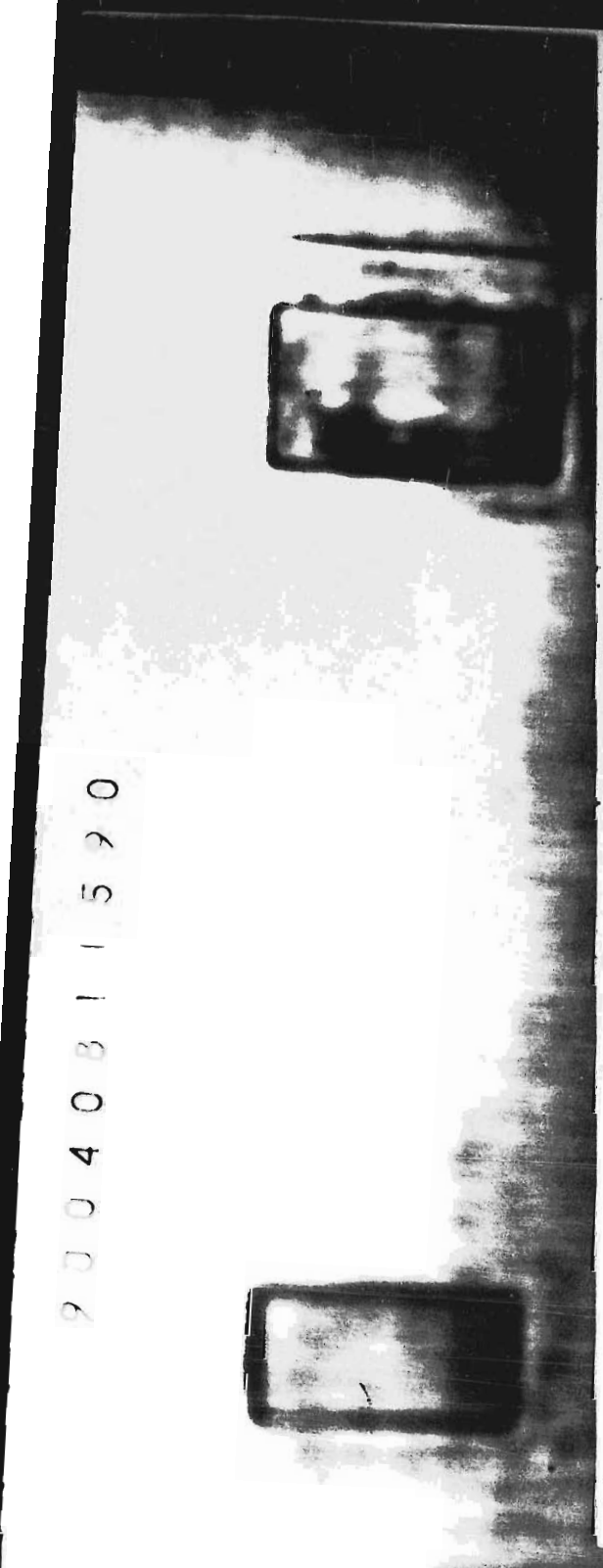
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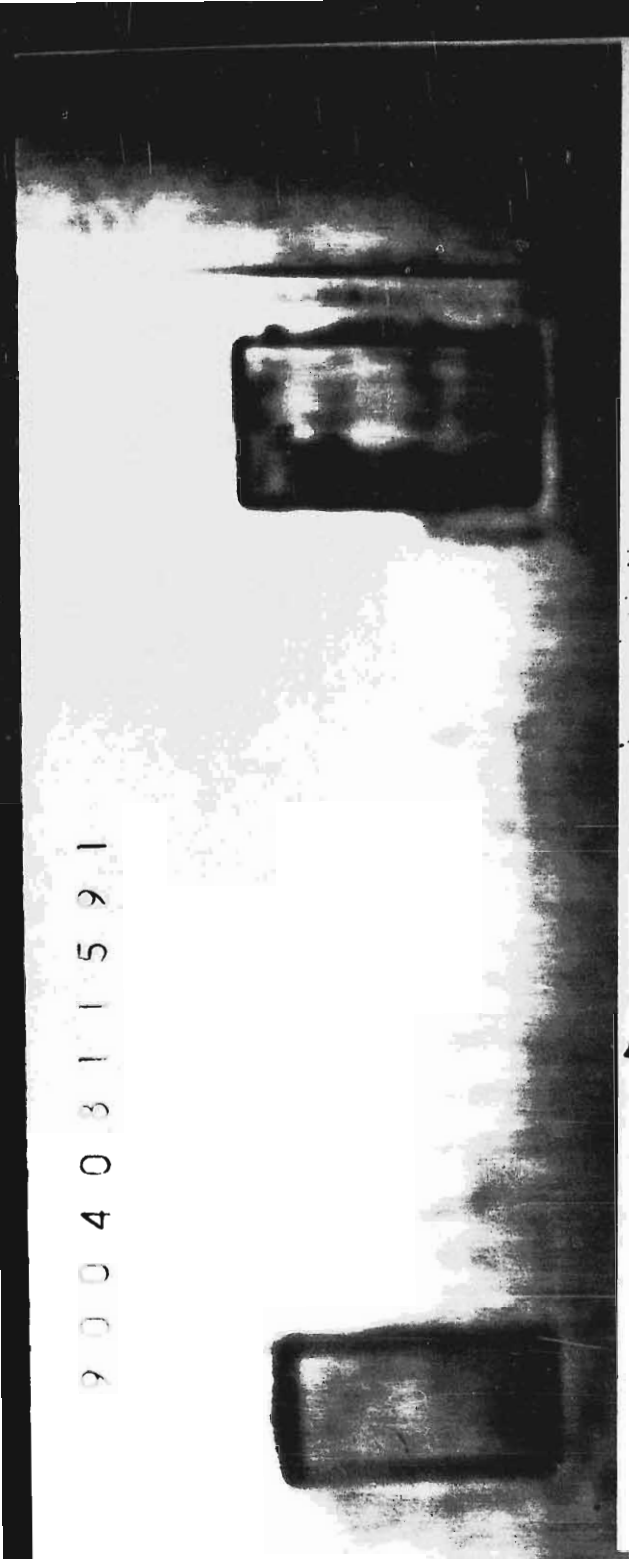


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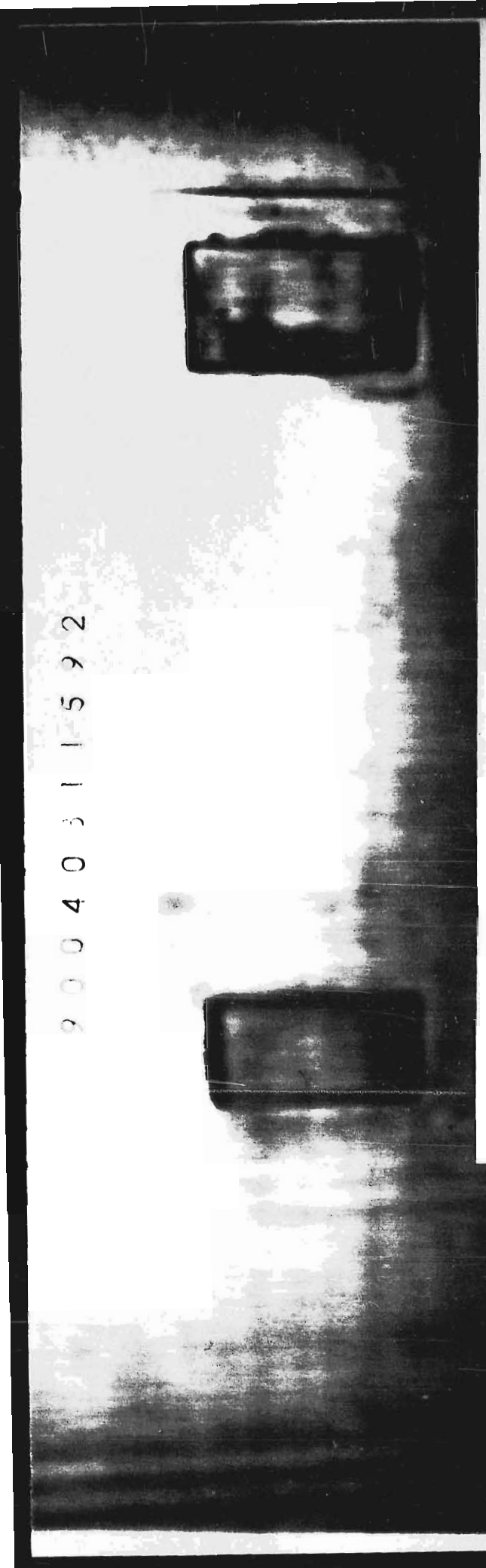


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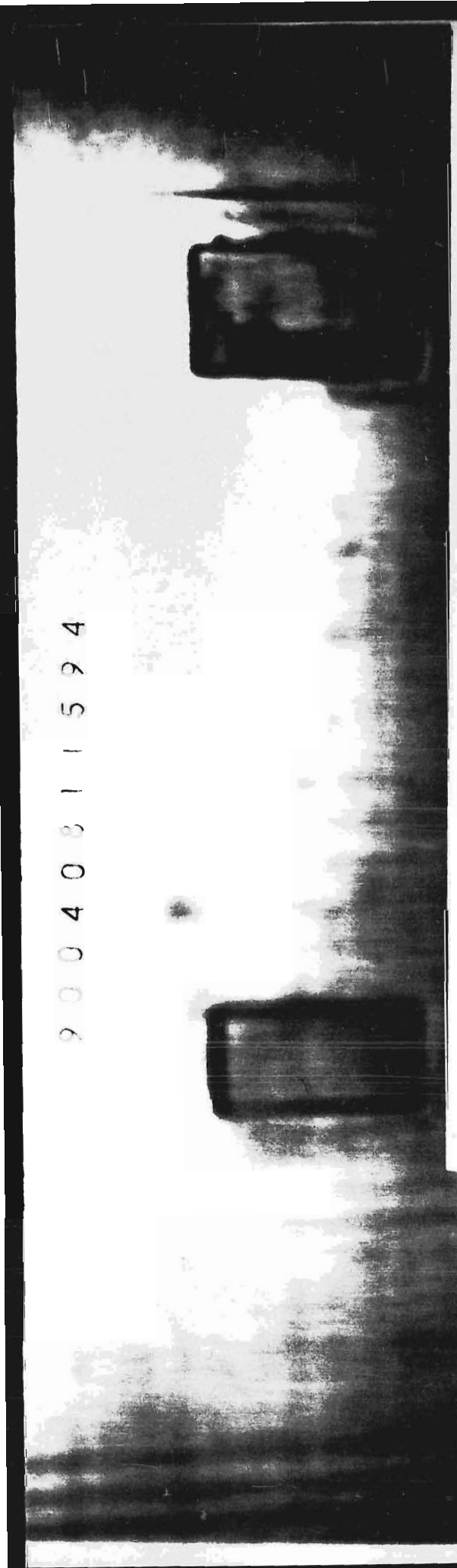
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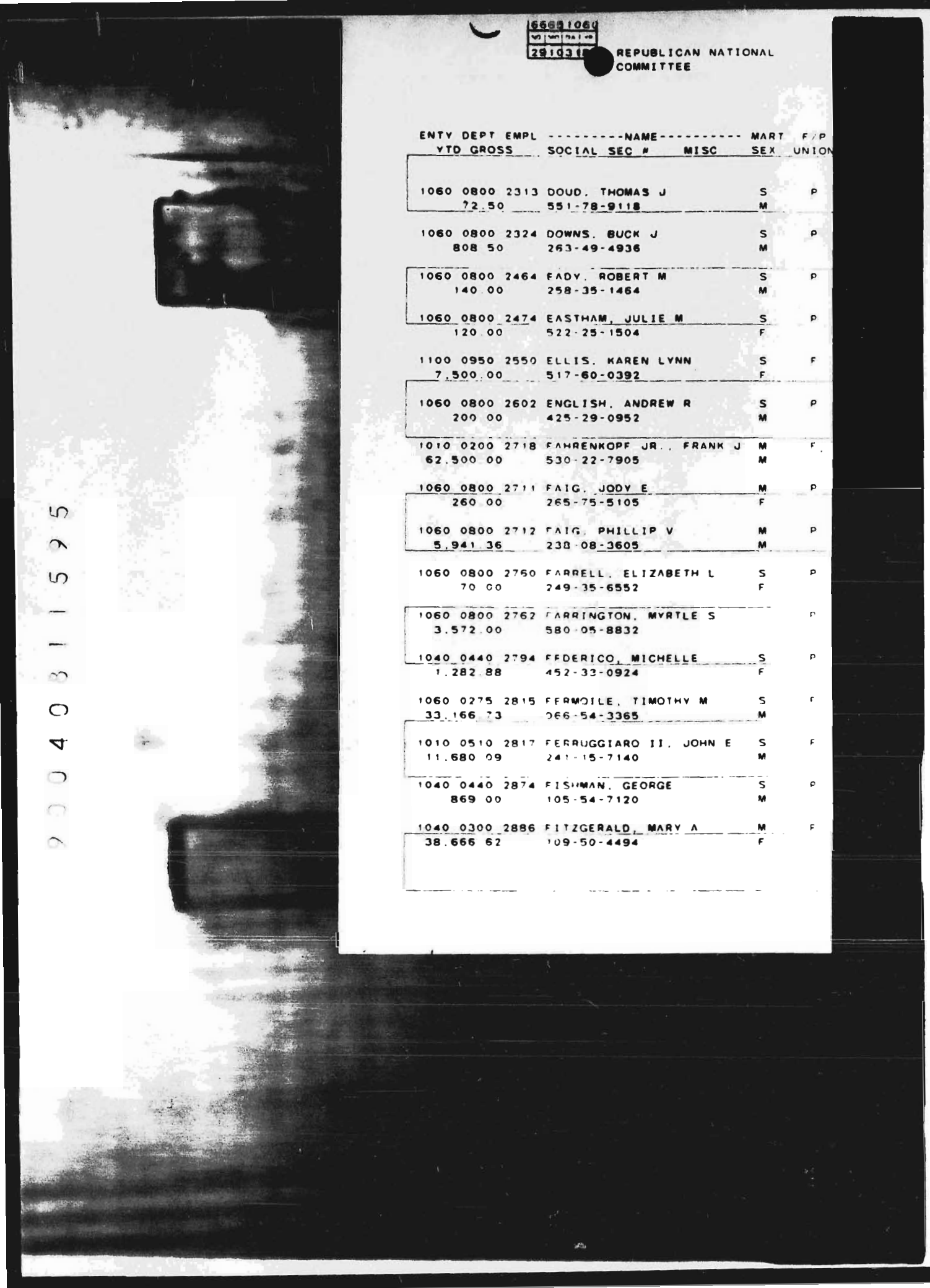
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REPUBLICAN NATIONAL COMMITTEE

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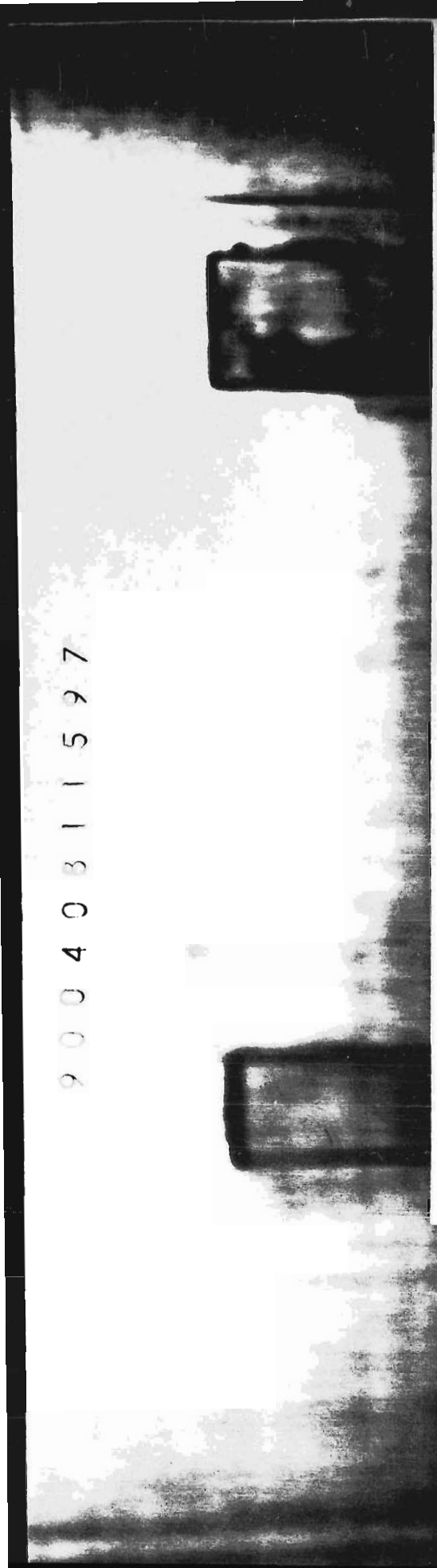
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1060 0800 2986 35.00	FORSTER, SARAH A 007-78-7250	S F	P
1060 0800 3009 3,986.73	FOWLER, CHANTICE M 212-11-5762	S F	P
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1060 0800 3066 423.38	FRIEDRICH, MARY K 027-60-3702	S F	P
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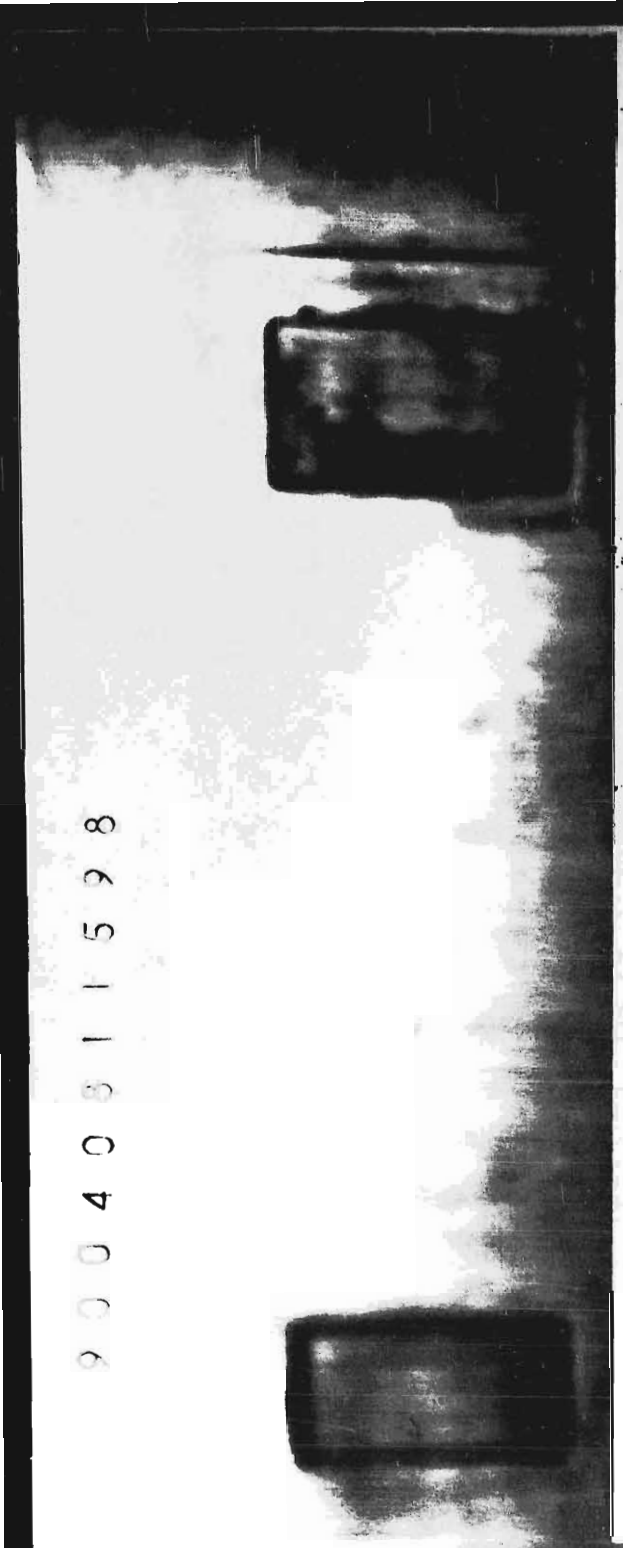


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1040 0440 3256 44.00	GIBSON, JEFFREY GILBERT 521-94-5400	S P M
1040 0810 3257 7,214.11	GIBSON, KIMBERLY TIMMONS 578-70-8321	S F F
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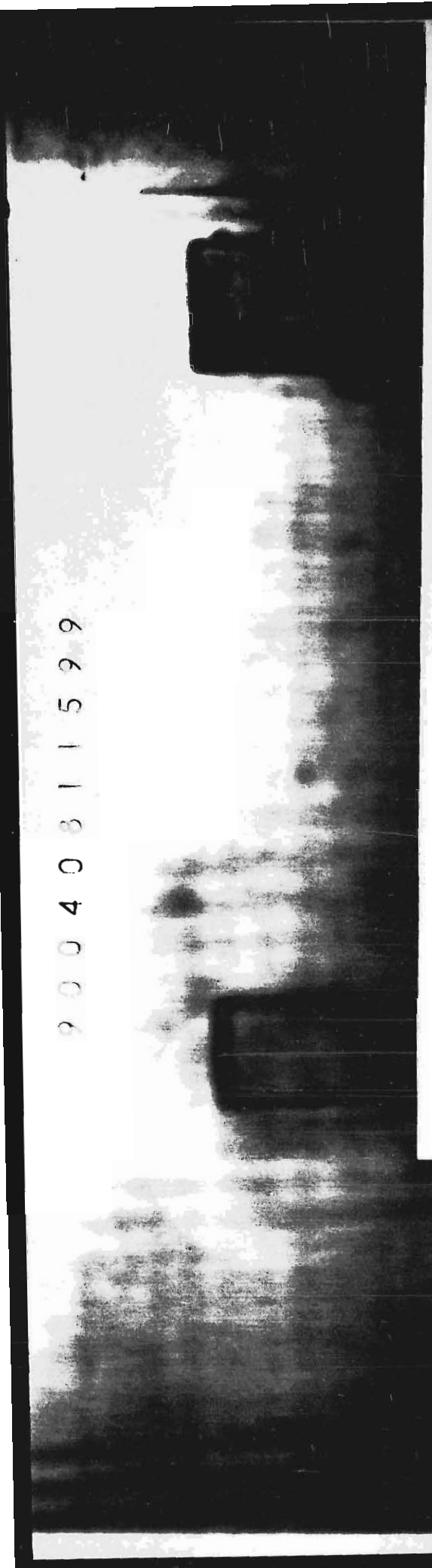
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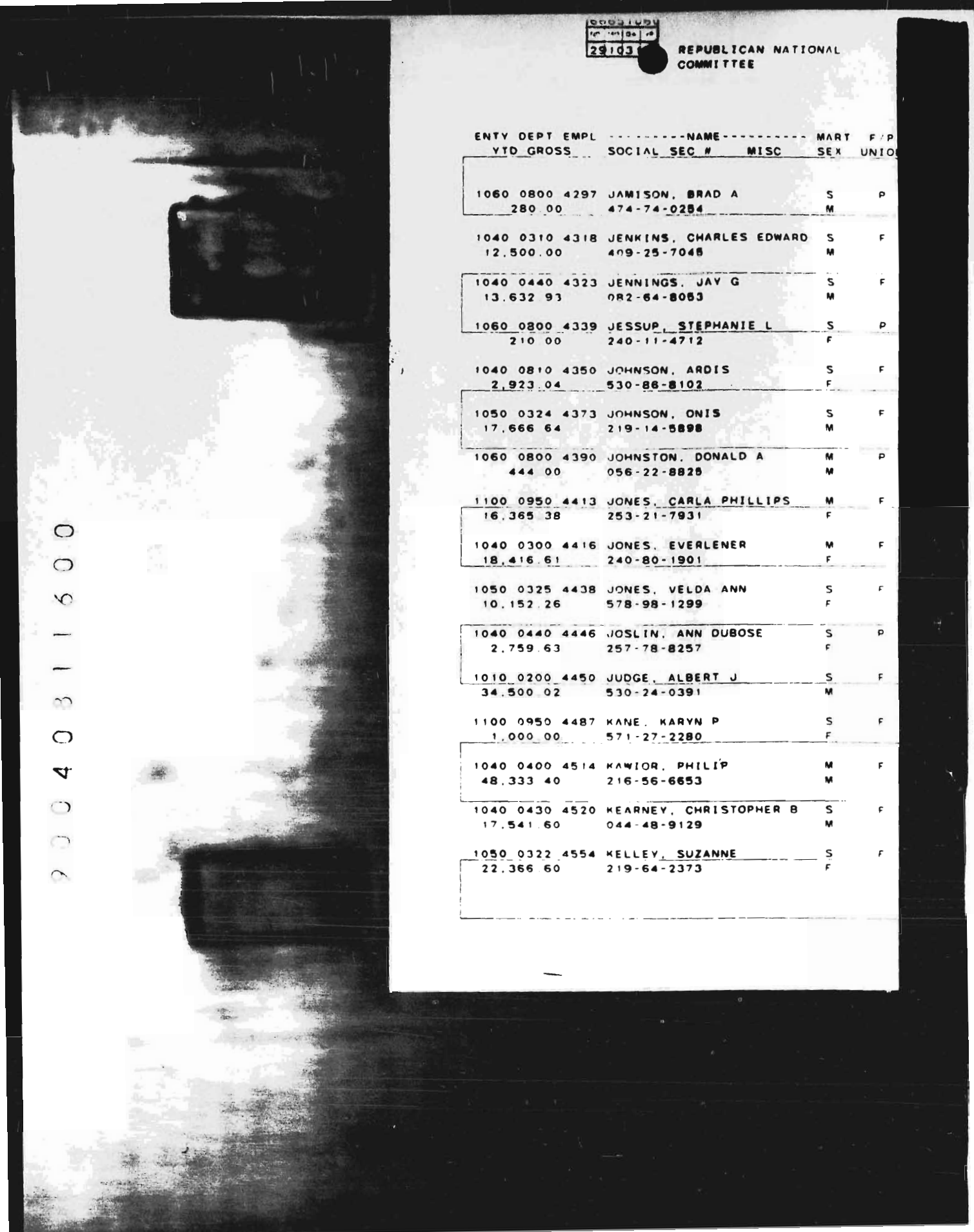
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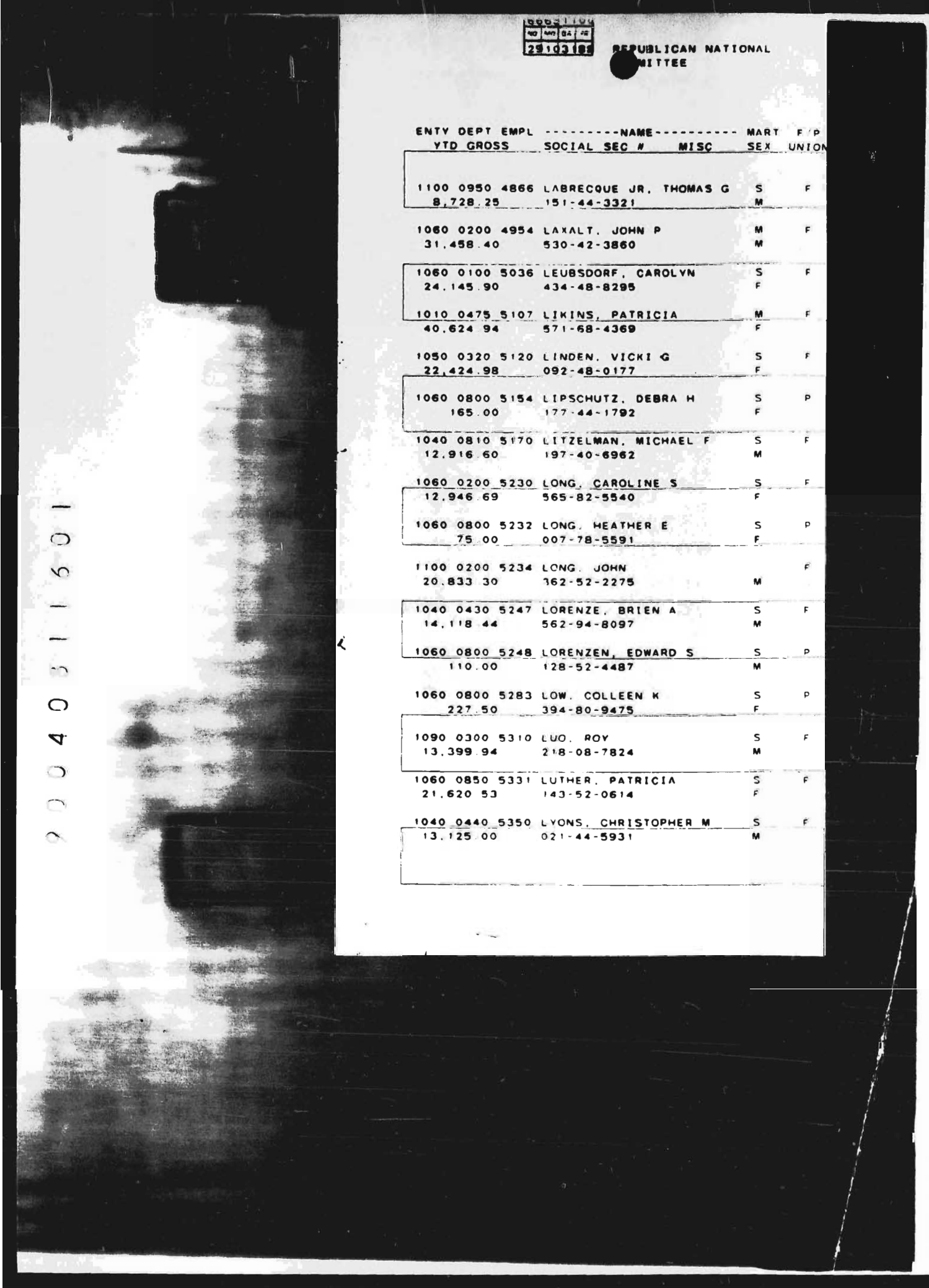
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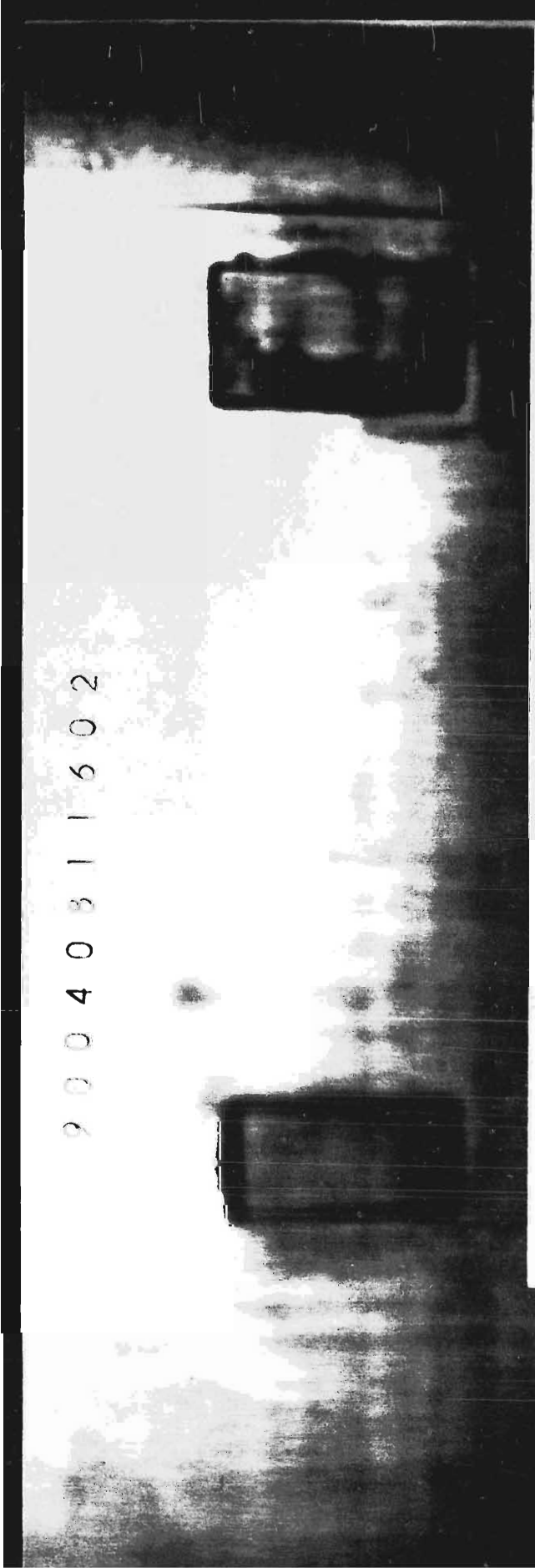
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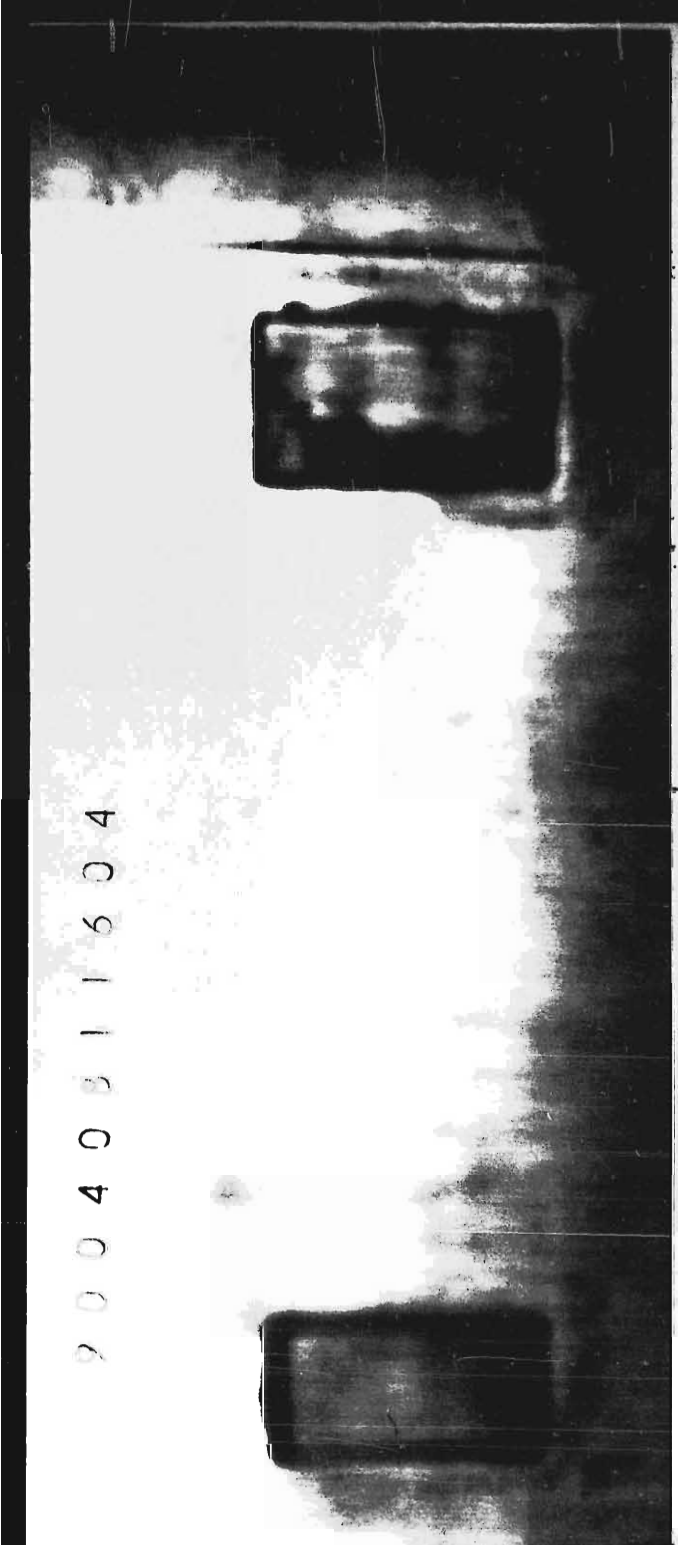
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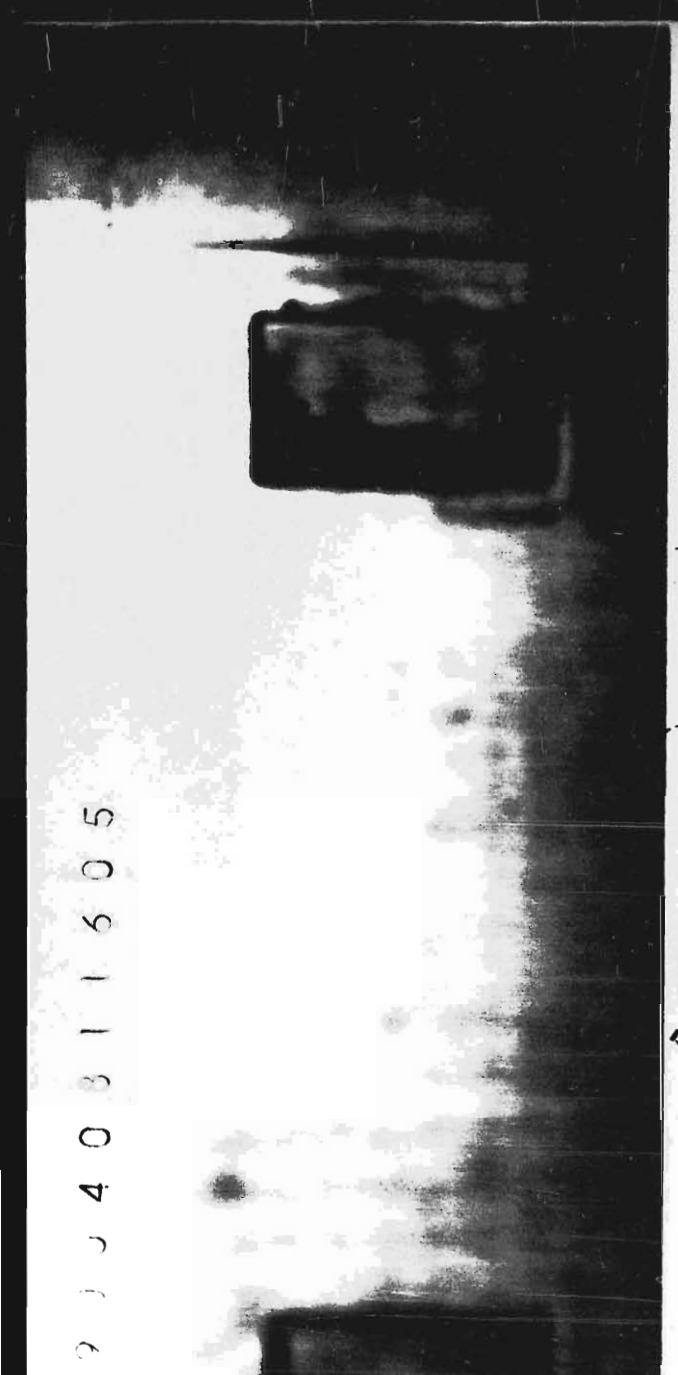
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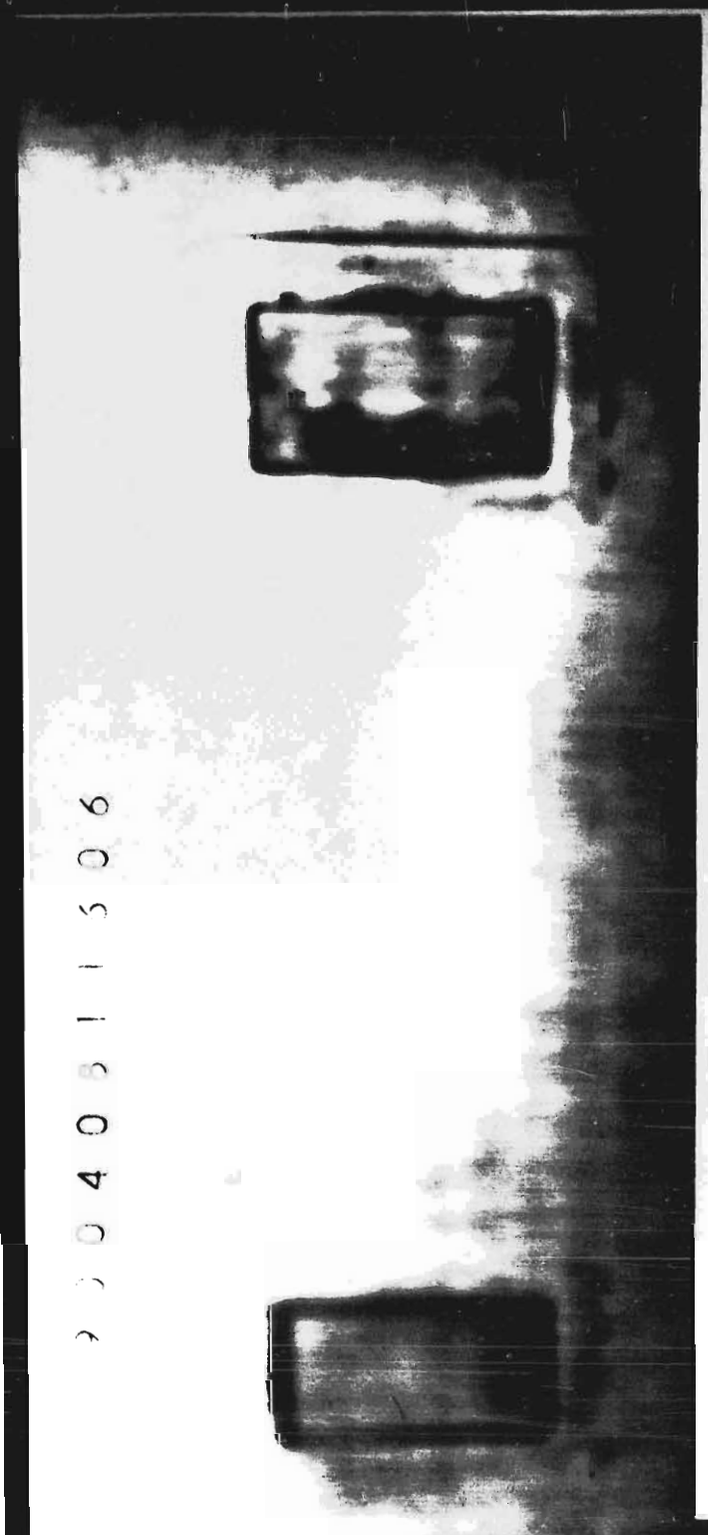


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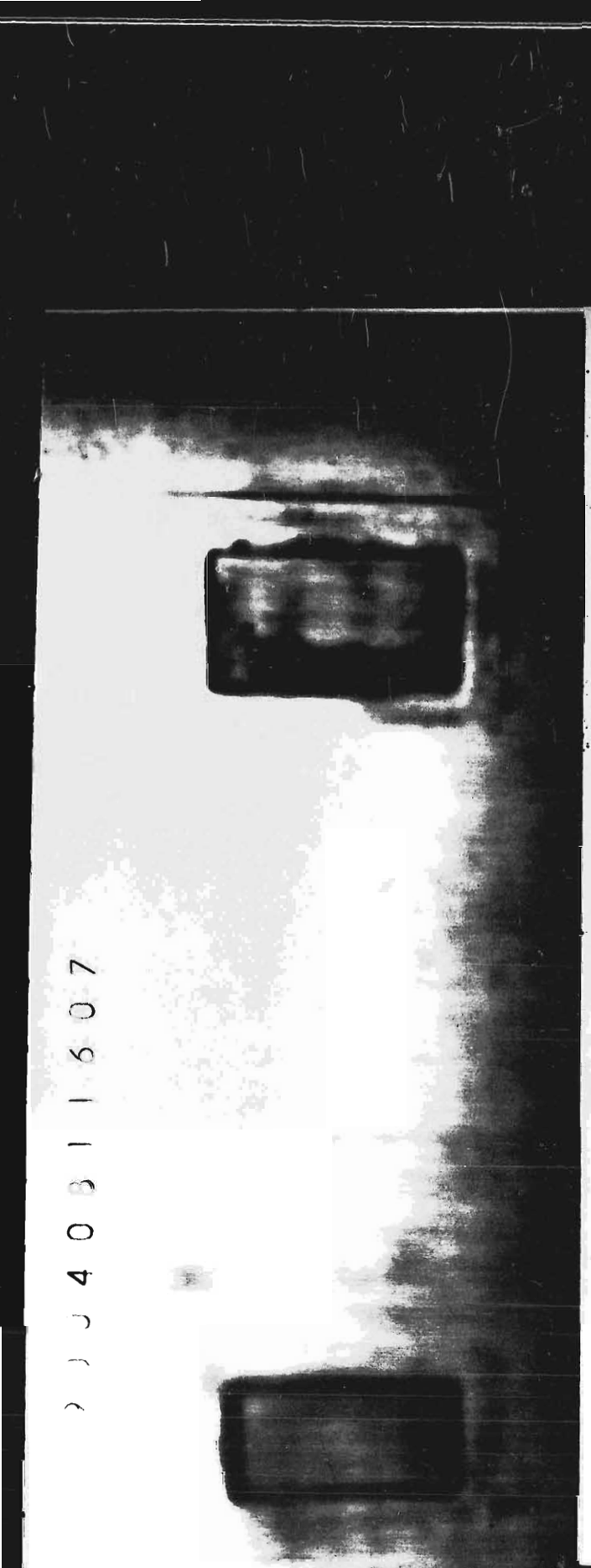
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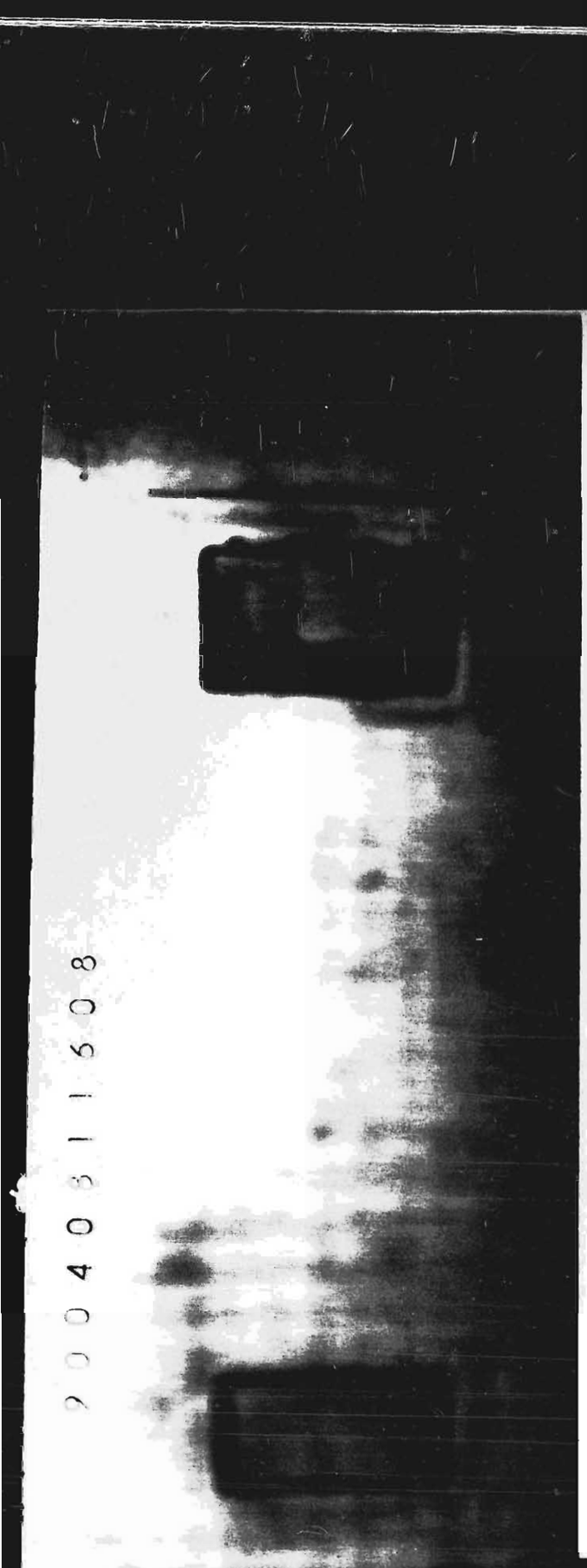
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1060 0800 7056 75.00	PLACE, MICHAEL S 215-98-7963	S P M
1040 0800 7080 25,166.64	POLATTY, DAPHNE 224-04-8692	S F F
1060 0800 7093 1,838.13	POOLE, ACQUA M 579-84-3626	M P F
1100 0700 7100 18,708.36	PORTER, DAVID BRITTON 351-66-0736	S F M
1100 0600 7115 41,166.62	POWELL, CAMILLA S 425-34-7342	S F F
1040 0100 7121 6,932.00	POWELL, PATRICIA H 579-26-0049	M P F
1040 0440 7128 7,756.13	PRICE, CHRISTOPHER 156-60-1649	S P M
1090 0100 7129 4,679.61	PRICE, LESLIE A 250-19-7351	S F F
1040 0810 7131 6,317.90	PRINCE, STEPHANIE 571-72-1561	S F F
1060 0800 7132 1,878.75	PRINCE, VICTOR I 343-64-8463	S P M
1100 0200 7133 41,666.60	PRINE JR., CHARLEY E. 454-96-1373	M F M
1060 0800 7143 305.00	PROVENZANO, CAROLYN F 317-50-6760	M P F
1060 0200 7210 23,250.00	RAMBAUT, SANDRA L 208-36-9287	M F F
1060 0800 7218 3,044.12	RAMOS, MELANIE J 295-64-0865	S P F



REPUBLICAN NATIONAL COMMITTEE

ENTY DEPT EMPL YTD GROSS	---------NAME---------- SOCIAL SEC #	MISC	MART SEX	F/P UNION
1040 0810 7219 6,000.00	RAND, JOHN K 016-60-1480		S M	F
1040 0440 7225 2,883.50	RAPUANO, KENNETH P 157-38-2512		S M	P
1020 0100 7270 58,333.40	REAGAN, MAUREEN ELIZABETHM 563-40-8753		F	F
1040 0620 7272 25,833.40	REBSCHER, MARTHA D 120-46-0323		S F	F
1110 0100 7296 5,833.40	REEVES, STOCKTON 594-05-5494		S M	F
1060 0850 7306 1,605.88	REHMEYER, RICHARD K 571-92-2719		S M	P
1040 0620 7314 13,750.00	REID, CLARK L 415-88-2387		S M	F
1100 0950 7324 2,250.00	REISSIG, TONY C 287-46-3460		S M	F
1060 0800 7335 5,175.51	RENNER, DOUGLAS C 579-76-9922		S M	P
1060 0800 7365 911.25	RHYANT, CYNTHIA J 118-42-1201		S F	P
1060 0800 7417 2,417.50	RIBOVICH, GREGORY J 192-42-3205		S M	P
1040 0810 7398 3,564.08	RICHARDSON, ANNE RORUM 229-02-4647		S F	F
1060 0100 7420 19,166.60	RICKERT, KRISTIN M 045-40-7238		S F	F
1060 0800 7454 100.00	RINGEL, JON 044-58-6338		S M	P
1060 0800 7485 88.75	ROBBINS, REAGEN C 360-70-0174		S F	P
1090 0200 7495 9,135.90	ROBERTS, MICHAEL R 552-37-7164		S M	F

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REPUBLICAN NATIONAL COMMITTEE

ENTY DEPT EMPL YTD GROSS	NAME SOCIAL SEC #	MART SEX	F P UNIC
1060 0800 7522 5,181.28	RODDY, RUSSELL W 536-48-9781	S M	P
1100 0390 7518 27,416.62	RODGERS, MARK W 218-80-8315	S M	F
1040 0710 7555 14,749.98	ROJAS, CARLOS A 464-47-2555	S M	F
1100 0500 7562 47,500.00	ROLDAN, RICHARD R 522-06-3648	S M	F
1060 0800 7563 275.00	ROLFSEN JR, ROBERT J 435-29-5120	S M	P
1040 0100 7602 25,875.00	ROSNICK, SUSANN C 137-46-0362	S F	F
1110 0100 7610 800.00	ROTHMAN, GREG [illegible]-42-4520	S M	P
1060 0800 7634 12,749.99	RUBLOFF, STEVEN A 579-66-4447	S M	F
1060 0800 7637 248.56	RUDD, TAMERA A 437-21-7942	S F	P
1060 0800 7638 20.00	RUDOLPH, MARIE 525-23-9197	S F	P
1060 0800 7642 895.00	RUFTY, CATHERINE O 238-30-2732	S F	P
1060 0800 7661 460.00	RUSSELL, B ANNE Q 577-52-1630	S F	P
1090 0100 8670 12,752.22	SALAZAR, HOLLY A 403-78-1203	M F	F
1100 0950 7795 2,166.68	SCHABEN, KELLY ANN 330-17-0449	S F	F
1060 0800 7796 420.00	SCHAEFFER, JOSEPH H 045-50-3190	S M	
1040 0440 7802 15,041.67	SCHILLING, JOHN M 564-92-5475	S M	F

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REPUBLICAN NATIONAL COMMITTEE

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1100 0600 7860 22,000 02	SCHNEIDER, PAUL S 078-58-2279	S F M
1060 0850 7864 13,724 15	SCHNEIDER, WILLIAM R 469-96-1834	S P M
1060 0800 7834 125 00	SCHULTES, CYNTHIA M 563-95-0667	S P F
1040 0440 7940 2,792 38	SCHWARZ, JAYNE M 080-64-7624	S P F
1100 0200 7982 19,083 28	SCRIBNER, JOHN E 444-78-2024	S F M
1060 0800 7988 292 50	SEARLY, STACEY L 384-80-6979	S P M
1060 0275 7990 9,000 00	SEARS, JAMES WHEELER 451-06-7405	S F M
1040 0440 8000 2,680 89	SEE, DENNIS 326-72-0669	S P M
1040 0440 8020 7,032 01	SEMANKO, NORMAN M 519-02-8270	S P M
1040 0440 8024 26,416 64	SENESE, DONALD J 353-34-4040	M F M
1060 0850 8045 14,145 90	SHALTON, SUE CHING 587-90-3666	S F F
1090 0300 8105 34,908 40	SHEWELL, LARRY R 220-56-4455	M F M
1090 0400 8110 13,577 88	SHINER, JACQUELINE M 196-50-7603	S F F
1060 0800 8114 1,060 00	SHIPMAN, AVRIL E 578-58-0825	M P F
1060 0850 8122 357 50	SHOPBELL, ELIZABETH L 459-61-0356	S P F
1040 0440 8160 24,765 06	SILAS, ALGIS J 329-60-5811	S F M

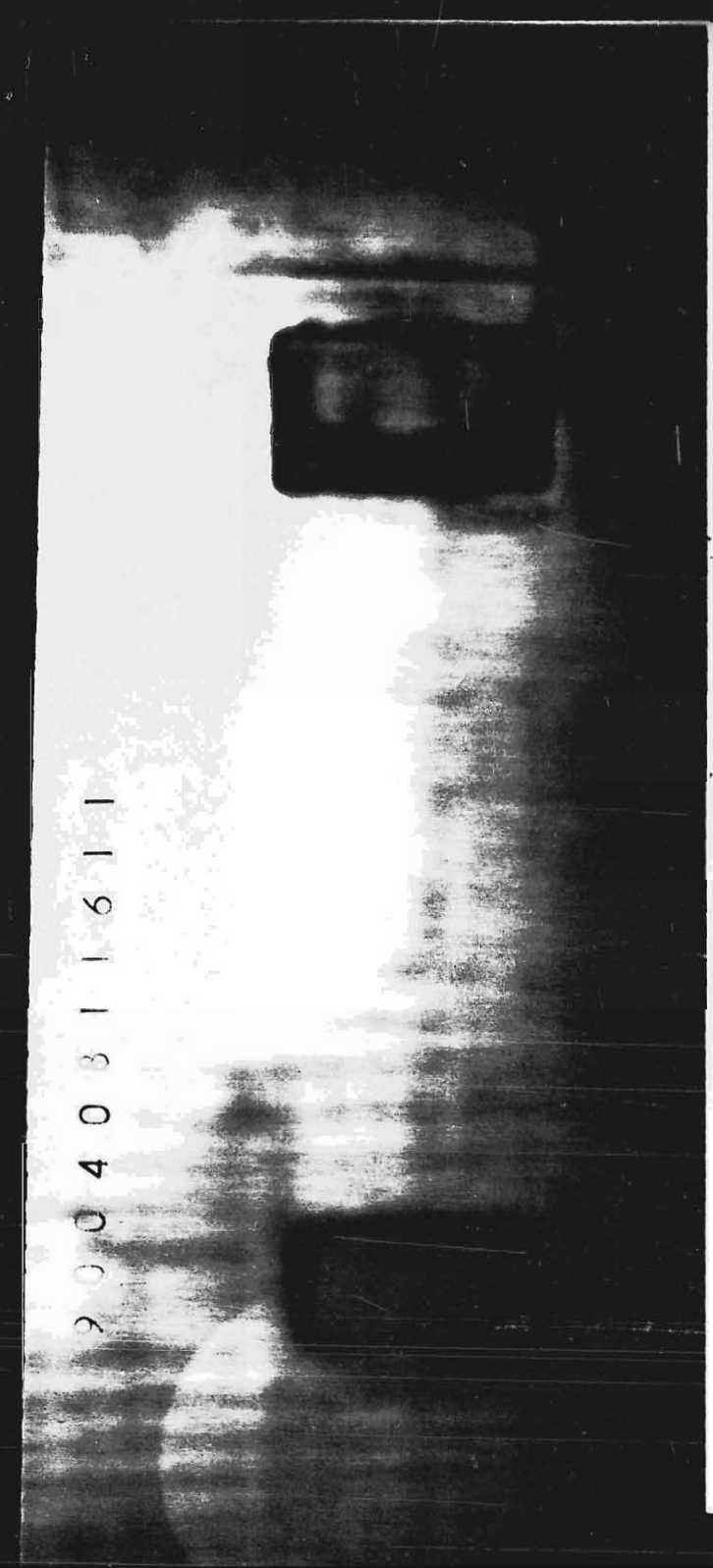
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REPUBLICAN NATIONAL COMMITTEE

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1060 0800 8161 42.50	SIMARANO, VICTORIA 034-62-1573	S P F
1060 0800 8165 15,250 02	SIMMONS, LAURETTA S 212-76-6398	S F F
1060 0800 8213 769 38	SKESTOS, STEPHANIE K 287-50-1247	S P F
1050 0210 8220 24,458 36	SLACK, EVELYN 571-38-7188	S F F
1060 0100 8303 50,833 40	SMITH, PHIL 402-82-7168	S F M
1060 0800 8304 8,058 96	SMITH, PHILIP H 228-04-3462	S P M
1040 0670 8304 5,941 04	SMITH, RONALD M 226-76-1676	M F M
1040 0440 8363 12,193 96	SOBBA, DAVID L 511-78-7606	S F M
1060 0800 8387 7,999 76	SOTTONG, MATTHEW R 220-92-0066	S P M
1060 0800 8403 130 00	SPAETH, MICHAEL P 048-74-7808	S P M
1060 0200 8445 9,397 01	STAFFORD, JEANNE M 124-64-4957	S P F
1010 0400 8450 27,183 40	STANARD, PAMELA P 217-44-5426	S F F
1040 0430 8461 6,199 36	STARK, HEATHER E 217-76-0819	S F F
1100 0950 8470 1,600 00	STEBENNE, CYNTHIA L 534-64-3188	S F F
1060 0800 8486 125 00	STEGNER, SUSAN S 141-64-7613	S P F
1060 0800 8475 8,685 88	STEINBERG, HOWARD L 012-60-6471	S P M

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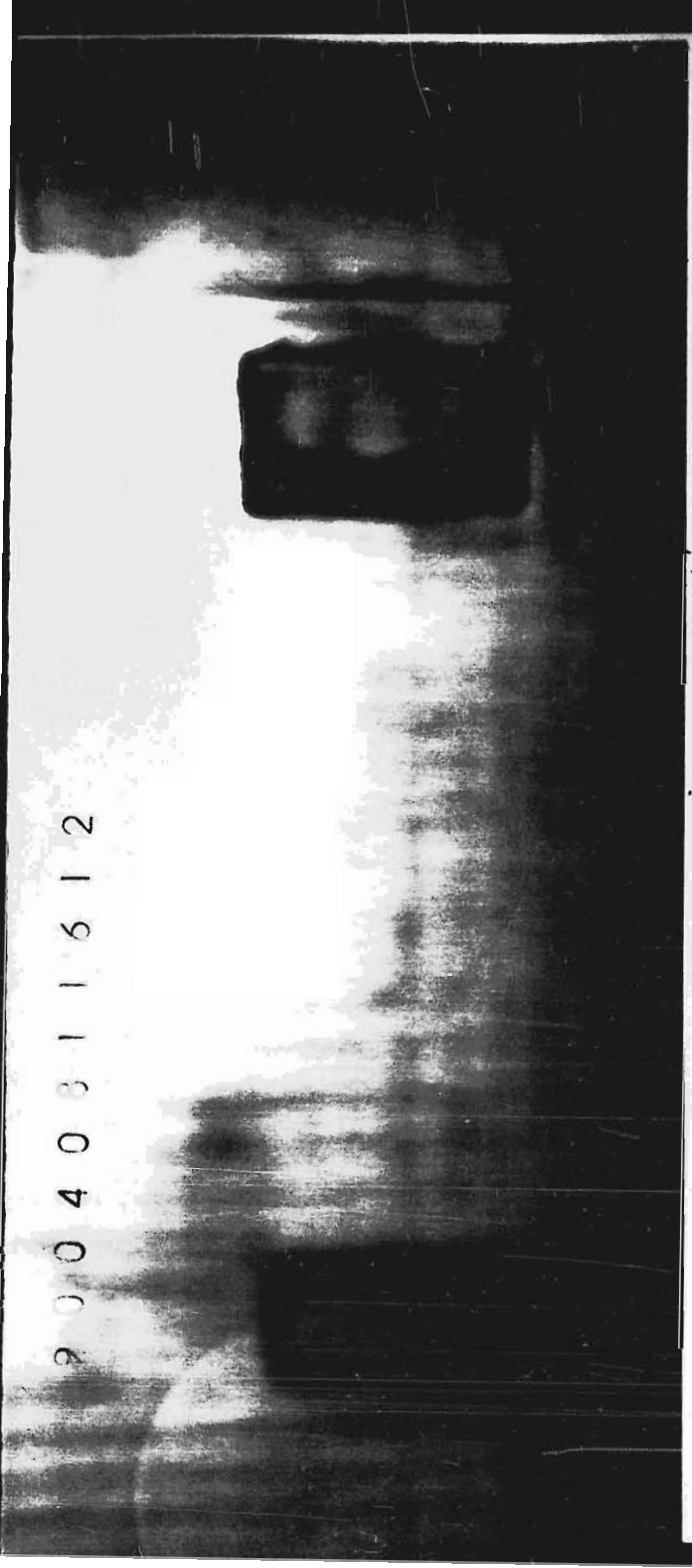


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REPUBLICAN NATIONAL COMMITTEE

ENTY DEPT EMPL YTD GROSS	----------NAME---------- SOCIAL SEC # MISC	MART SEX	F P UNIO
1060 0800 8531 7,420.40	STEWART, ELIZABETH A 158-58-4613	S F	P
1060 0800 8541 96.25	STILLITTANO, TERESA M 081 54-5336	S F	P
1060 0800 8547 40.00	STOCUM, LINDA 096-52-4136	S F	P
1040 0310 8550 17,833.36	STOKELD, FREDERICK W. 228-11-4937	S M	F
1040 0670 8564 1,683.75	STOREY, ANNE BENJAMIN 400-19-5594	S F	P
1060 0900 8543 31,666.60	SUAREZ, ELIZABETH E 101-46-1046	M F	F
1060 0800 8605 2,680.20	SUIT, MARY B 215-02-0930	S F	P
1060 0800 8649 67.50	SWANK, CYNTHIA L 173-54-3399	S F	P
1060 0800 8653 1,263.56	SWARTH, KENNETH J 067-44-6218	S M	P
1040 0800 8664 21,000.06	SWISHER, ANN L 453-25-4049	S F	F
1090 0100 8705 15,291.62	TANDY, ROY W 539-28-7045	S M	F
1040 0440 8717 14,393.59	TAYLOR, JAMES R 173-62-1941	S M	P
1110 0200 8718 25,000.00	TAYLOR, PAMELA JOY 404-66-5432	S F	F
1060 0850 8735 1,541.26	TEEFY JR, JOSEPH M 223-19-6851	S M	P
1060 0100 8750 41,416.60	THAWLEY, NANCY B 456-70-7092	S F	F
1060 0800 8793 440.00	THOMPSON, ALAN B 239-35-7508	S M	F



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REPUBLICAN NATIONAL COMMITTEE

ENTY DEPT EMPL YTD GROSS	NAME SOCIAL SEC # MISC	MART F SEX UN
1060 0800 8794 127.50	THOMPSON, ENID M 434-43-3924	S F
1060 0275 8797 13,475.00	THOMPSON, MARILYN BEVERLYM 212-54-5792	F
1060 0800 8826 155.00	THORNTON, TODD L 301-68-6453	S M
1040 0440 8828 23,250.06	THORSON, DONALD 579-64-5849	S M
1010 0200 8837 36,583.36	TIERNEY, PATRICIA 067-34-8073	M F
1040 0440 8862 41,166.62	TODD, DONALD G 531-42-8794	M M
1010 0400 8870 9,727.20	TOLAND, JUDITH A 515-40-4521	M F
1040 0400 6134 23,916.64	TOLER, MARY MINICHAN 223-90-1135	M F
1060 0800 8875 4,055.50	TOMASKI, JAMES E 560-88-2430	S M
1060 0850 8877 790.00	TOOMEY, ANNE M 225-86-3440	S F
1060 0300 8879 15,139.66	TOOMEY, ELIZABETH M 227-80-0759	S F
1040 0600 8927 34,416.60	TRON, BARRIE R 226-04-1177	S M
1090 0400 8948 34,124.99	TSAPOS, IOANNIS 231-04-9561	M M
1060 0800 8963 1,291.25	TURNER, DARLENE 577-80-0902	M F
1060 0200 8980 50,500.01	TYSON, BETSY 366-51-9604	S F
1040 0100 8995 14,359.73	ULM, EUGENE C 556-49-7012	S M

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ENTY DEPT EMPL YTD GROSS	NAME SOCIAL SEC # MISC	MART SEX	F P UNION
1100 0390 9034 32,208.40	VALENTE III, MARK 072-62-8108	S M	F
1040 0440 9012 11,209.75	VALENTINE, M PRATT 211-66-5671	S M	P
1100 0200 9014 38,666.62	VALIANTE, MICHAEL A 039-38-0175	S M	F
1010 0210 9036 19,153.69	VAN REST, JUDY 513-48-9224	S F	F
1060 0800 9045 171.25	VENTIMIGLIA, LINDA M 052-70-5490	S F	P
1040 0620 9055 30,375.02	VERNON, CAROL 195-40-2753	S F	F
1100 0700 9060 39,208.40	VICTOR, JAYNE L 224-02-2207	S F	F
1060 0275 9078 18,001.92	VOGT, JEFFREY WEIL 332-52-5468	S M	F
1010 0200 9120 53,333.40	WADE, TERRY M 551-66-0996	M M	F
1060 0800 9165 1,622.45	WALDEN, ANN T 105-17-1960	S F	P
1100 0950 9170 5,092.30	WALKER, RANDALL SCOTT 292-64-6400	S M	F
1040 0440 9180 121.00	WALL, ANDRU 501-04-6038	S M	P
1060 0850 9182 1,265.00	WALLACE, DOUGLAS S 151-44-9544	S M	P
1060 0800 9187 675.00	WALLS, PETER R 045-52-2459	S M	P
1040 0440 9192 5,363.63	WALTER, ELIZABETH ANNE 518-06-2479	S F	P
1040 0440 9194 19,354.14	WALTER, JAMIE 516-60-7263	S F	F

ENTY DEPT EMPL YTD GROSS	----------NAME---------- SOCIAL SEC #	MART SEX	F UN
1060 0800 9234 132.50	WARD, AMY E 594-09-6964	S F	F
1060 0800 9236 4,401 89	WARD, JEFFREY B 213 98-3990	S M	F
1060 0800 9282 182 50	WATERS, LESLIE C 592 03-7733	S F	F
1040 0440 9290 1,386 00	WATKINS, MARIE 215-44-1905	S F	F
1110 0500 9345 18,916 64	WEBB, WILLIAM M 543-80-5328	S M	F
1060 0800 9460 11,043 02	WEST, HELEN J 5[illegible]-64-4460	S F	F
1100 0200 9548 9,332 63	WHITE, WALTER 367-78-7672	S M	F
1090 0300 9562 25,020 90	WHITMAN, MARC 538-72-6894	S M	F
1040 0440 9654 9,828 00	WILLIAMS, KAREN M 448-64-7241	S F	F
1020 0200 9683 30,833 38	WILLSON, ALEXANDRA 266-94-4274	S F	F
1060 0800 9720 8,216 84	WILSON, PATRICIA A 5[illegible]-86-4466	M F	F
1060 0800 9724 1,120 00	WILSON, WENDY D 409-25-8181	S F	F
1060 0800 9764 2,711 64	WINTERS, HEATHER E 402-02-8401	S F	F
1100 0200 9829 15,025 84	WOOD, ELIZABETH M 231-72-3822	S F	F
1040 0810 9834 3,553 82	WOOD, HEATHER 535-58-9221	S F	
1050 0323 9831 18,806 42	WOODS, DARRICK W 579-78-5089	S M	

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ENTY DEPT EMPL YTD GROSS	NAME SOCIAL SEC #	MISC	MART SEX	F UNI
1060 0850 9833 923.63	WOODS, RACHEL A 033-42-6004		S F	P
1060 0200 9963 20,000.00	ZAHNISER, DULCE A 089-40-9639		S F	F
1060 0800 9977 1,218.75	ZIEBERT, MATTHEW J 39[illegible]0-0992		S M	P
1060 0800 9978 2,313.75	ZIETLOW, RICHARD G 395-44-7572		M M	P
1040 0440 9980 2,667.50	ZIZZI, PERRY V 069-54-8978		S M	P

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GEORGE BUSH

Ms. Helen Counts
1374 Augusta Street
Bluefield, WV 24701

Dear Ms. Counts:

I have witnessed the horror of war.

I have shed blood in the fight to protect America's freedom.

To compare a Presidential campaign to warfare would diminish the real sacrifice made by so many of our citizens who served, as I did, in the defense of our Republic.

Yet, a Presidential campaign is a clash of ideals. It is a confrontation between two value systems. It is a historic struggle between the strange logic of the ideologues on the left . . . and the practical wisdom and common sense of the right.

You have served in this struggle for many years, Ms. Counts.

The support you have given to our Party and our candidates created a tidal surge of victories -- which have brought us 66 months of unprecedented growth and prosperity.

But ours is an endless contest -- one in which those who hold the high ground must constantly defend against the forces who would wreck our accomplishments without thought or care.

I call on you today to join with me to renew our timeless battle -- for I need your help to win.

Will you launch our Republican victory for 1988 today by rendering a contribution for at least $20 to "Victory '88?"

For fifty years, the tax and spend philosophy of the Democrat Party has been frozen in amber, locked in ice. You, more than most, have been the Democrats' victim when they have held the reins of power.

You've paid the exorbitant taxes their ill-conceived "solutions" have cost.

(Over, please)

Paid for by the Republican National Committee

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You've suffered the fear created when their anti-defense decisions have placed our nation in danger.

You've shouldered the concern when they use our teachers for political clout and ignore the illiteracy among our children.

And your future has been mortgaged to the hilt by a liberal Congress that is intent on worsening the debts of our government by overspending.

Yet in 1980 -- when you stepped forward with others to protest too many years of Democrat doom, decay and debt -- we threw off the yoke of liberal power.

America was saved in 1980 because you, and many others, invested in the victory that swept Ronald Reagan, myself and hundreds of G.O.P. candidates into power through efforts like "Victory '88."

We won the White House. We won the Senate. And we won a working majority in the U.S. House.

Stunned by their losses, our Democrat opponents have sought a clever camouflage.

They've tried to blame Ronald Reagan for the deficits they, themselves, voted in.

They've tried to take credit -- such as the so-called "Massachusetts Miracle" -- for our seven-year economic boom which is a direct result of national Reagan-Bush economic policies.

They've tried to blame our Administration for the epidemic of drug abuse, when they themselves have denied us the tough law enforcement tools we need.

I feel certain most Americans will see through their deceptions.

I feel certain most Americans will find unacceptable a candidate for President who as Governor of Massachusetts turned loose first-degree murderers on unsupervised weekend furloughs -- murderers sentenced to life without parole -- even after one of them, Willie Horton, went on to terrorize a Maryland couple in their home, stabbing the man and raping the woman . . .

. . . a Governor who vetoed a bill to impose mandatory prison sentences on major drug dealers . . . and who vetoed legislation to have school teachers lead their classes in the Pledge of Allegiance.

I feel certain most Americans will find that those values are not their values.

Continued . . .

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Yet it is our task -- yours and mine -- to do more than expose the falsity of the Democrat dogma.

It is our challenge, yours and mine, to recharge our Party, and the citizens who support it, to elect those who will take this nation to ever-greater heights.

Will you meet that challenge with me now by making the most generous contribution possible to "Victory '88?"

One organizer described "Victory '88" to me as "the Republican Party version of the United Way campaign," a special nationwide effort aimed exclusively at helping Republicans win from the White House to the Court House.

Through "Victory '88" we'll register thousands more Republican voters -- and turn them out on election day.

Through "Victory '88" your State Committee will have the funds for slate mailings and door-to-door drives that help each and every GOP candidate.

And through "Victory '88" we can repeat the giant win of 1980 -- and secure Republican leadership in the Oval Office, the Senate, the House and your state legislature.

But "Victory '88" funding is separate and apart.

The generous gifts you've sent to candidates or the national GOP can't be used for "Victory '88."

That's why I must know if you'll support our Republican effort now by making a direct gift to "Victory '88" by using the envelope I have enclosed.

Our Democrat opponents have vowed to raise a staggering $50 million for their version of "Victory '88" from powerful unions, limousine liberals and radical interest groups.

For our "Victory '88" program, we seek a broader base of support.

Our main goal is to have the personal support of key Republicans like you -- who can give $1,000 or $500 or $100 or just $50.

I know you are asked constantly for help. Many are depending on your support and commitment.

But as the umbrella campaign for the entire Republican effort in 1988, I urge you to give utmost attention to supporting "Victory '88" today.

Continued . . .

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From now until November, I will speak out on the issues and adhere to the Republican principles that have served this nation well for more than 130 years.

But my campaign is not a singular campaign against Michael Dukakis.

It is the vanguard of the entire national Republican effort to preserve, protect and defend the leadership and progress which Republican government has meant for America.

Your Republican Chairman in West Virginia, "Hike" Heiskell, has told me of the tremendous support you have given the West Virginia Republican Party over the years.

Now, to help the Party further -- to go above and beyond special Party operations you've supported in the past -- I urge you to make a special gift today to "Victory '88."

As I close, please let me leave you with one final thought.

America's defenders are not only those who have worn uniforms and clashed with our military enemies.

Our greatest defenders are men and women like you -- those who have worked and struggled to build a better future for your children and generations to come.

"Victory '88" is not my cause -- it is yours. For "Victory '88" is the only vehicle by which the America you want for our future will be achieved.

America lit the flame of liberty around the world. It is our duty, as inheritors of that sacred trust, to keep that flame burning bright today -- and in the days to come.

Please do not falter in this critical hour.

I urge you to support the victory America must have in 1988 through your support of "Victory '88."

Sincerely yours,

George Bush

P.S. It is critically important that we meet our Victory '88 goal for West Virginia. But, we cannot achieve that goal -- or the greater goal of Republican triumph -- without your help. I hope I can count on you for a special gift for "Victory '88" today.

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IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1069 CHARLESTON, WV

POSTAGE WILL BE PAID BY ADDRESSEE

VICTORY '88
West Virginia Republican Party
Post Office Box A
Charleston, WV 25362

P0040811621

VICTORY '88

SPECIAL REPLY TO:
VICE PRESIDENT GEORGE BUSH

FROM: Ms. Helen Counts
1374 Augusta Street
Bluefield, WV 24701

RE: West Virginia "Victory '88"

Dear Mr. Vice President:

I agree with you that we must band together to ensure that West Virginia and America are led by strong Republican leadership in the years to come.

We must keep up the fight to keep America strong -- both militarily and economically -- and build on the progress we've made during the Reagan/Bush administration.

To help with the Victory '88 voter programs in West Virginia that will help elect you President -- and elect Republican candidates across the board -- I am enclosing my contribution in the amount of:

( ) $20 ( ) $25 ( ) Other $_____

(Check should be made payable to: Victory '88--West Virginia Republican Party. Maximum personal contribution is $5,000 per person. Please return this form with your check in the postage-paid envelope enclosed. Thank you.)

Paid for by Victory '88--West Virginia Republican Party/Republican National Committee.
ARCH

A contribution is not deductible as a charitable contribution on your federal income tax return.

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If your name and/or address have recently changed, please use the space below to update our records:

Name

Home Address

City/State/Zip

Home Phone

Business Address

City/State/Zip

Business Phone

THE FEDERAL ELECTION COMMISSION REQUIRES THAT WE REQUEST THE FOLLOWING:

Occupation

Employer

____ Please check if self-employed

VICTORY '88

The Key to Republican Success on November 8

Your support of Victory '88 will help fund the following vital campaign programs:

1. Voter Registration



2. Voter List Development



3. Phone Banks



4. Target Mailings



As well as ***Ballot Security Programs*** and ***Campaign Materials*** such as Brochures, Bumper Stickers and Buttons.

HELP ASSURE REPUBLICAN VICTORIES FROM THE WHITE HOUSE TO THE COURTHOUSE THROUGH YOUR SUPPORT FOR VICTORY '88.

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RONALD REAGAN

September 30, 1988

Mr. Henry T. Grimes
2275 Fairground Rd
W Freindship, MD 21794

Dear Mr. Grimes:

During my years in the White House, I have pursued a special dream to renew our national spirit and to make America great again.

Thanks to Americans like you who have supported me, our Party, and our candidates, we have come closer to that dream.

Yet, ours is a lengthy journey. There is always a danger that those with a different vision may steer us off course.

It is our responsibility, yours and mine, to do everything within our power to keep this great nation moving forward as a beacon of freedom and liberty for the world.

That's why we need your support for "Victory '88."

I am proud that our Party has selected Vice President George Bush, my working partner of eight years, to lead us in the days ahead.

In 1988, it is our duty and privilege to work for his election. He will be a President who will serve us with honor, integrity, experience and vision.

It is also our duty as Americans to keep this country on course by electing responsible Republican men and women to serve us in the United States Congress, our state legislatures and in local government.

That's why I am joining with George Bush and all the leaders of the Republican Party in urging you to make a commitment today to "Victory '88."

I am proud of the accomplishments we have made over these past years.

(Over, please)

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

C00401625

Much of our progress was achieved because during my first six years in office, Republicans held a majority in the United States Senate, gained parity among our state Governors, and had a working majority in the United States House of Representatives.

We won those victories because Republicans like you stepped forward and gave so generously to the umbrella campaign organization that allied the efforts of our state and national GOP organizations.

"Victory '88" is the name of the umbrella program that will wage our victory this year. And today, "Victory '88" urgently needs the help and assistance that you have been known to give to candidates and Party organizations in the past.

Vice President Bush wrote you recently about "Victory '88" and outlined the dangers we face as Americans if we fail to keep the progress of these last eight years moving forward.

I join with him in asking for your help to ensure the election of a Congress that will make our dreams become a reality.

I truly appreciate how gracious you have been through the years in responding to my many requests.

It is because of the special spirit of Americans like you that I know America's best days are still ahead.

We cannot falter now; we cannot be complacent. George Bush and our team of Republicans urgently need your help to ensure we continue on the road of peace and prosperity.

As always, Nancy and I are grateful for all you have done.

We are confident you will build the victory America needs through your support for "Victory '88." God bless you.

Sincerely,

Ronald Reagan

Ronald Reagan

2004031626

VICTORY '88

SPECIAL REPLY

TO: Maryland Republican Party

FROM: Mr. Henry T. Grimes
2275 Fairground Rd
W Freindship, MD 21794

I am proud to step forward and join President Reagan in support of the Maryland Republican Party's "Victory '88" program.

It is critically important that we elect strong Republican leaders to both national and state offices to ensure we continue to build on the progress President Reagan has brought this nation.

To help "Victory '88" fund the voter programs to help George Bush and all our candidates win in November, I am enclosing my special contribution in the amount of:

( ) $50.00 ( ) 75.00 ( ) Other $_____

(Checks should be made payable to: Victory '88--Maryland Republican Party. A postage-paid return envelope has been enclosed for your convenience. Thank you for your support of "Victory '88".)

Paid for by Victory '88--Maryland Republican Party/Republican National Committee.

2171

9004081116627

If your name and/or address have recently changed, please use the space below to update our records:

Name

Home Address

City/State/Zip

Home Phone

Business Address

City/State/Zip

Business Phone

THE FEDERAL ELECTION COMMISSION REQUIRES THAT WE REQUEST THE FOLLOWING:

Occupation

Employer

____ Please check if self-employed

Contributions are not charitable deductions for income tax purposes

VICTORY '88

The Key to Republican Success on November 8

Your support of Victory '88 will help fund the following vital campaign programs:

1. Voter Registration



2. Voter List Development



3. Phone Banks



4. Target Mailings



As well as ***Ballot Security Programs*** and ***Campaign Materials*** such as Brochures, Bumper Stickers and Buttons.

HELP ASSURE REPUBLICAN VICTORIES FROM THE WHITE HOUSE TO THE COURTHOUSE THROUGH YOUR SUPPORT FOR VICTORY '88.

2004031628

ARYLAND

If you will kindly put a first class stamp on this envelope, you will save the Party return postage costs. Thank you.

VICTORY '88

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 989 ANNAPOLIS, MD.

POSTAGE WILL BE PAID BY ADDRESSEE

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

VICTORY '88
REPUBLICAN PARTY OF MARYLAND
60 West Street
Suite 201
Annapolis, Maryland 21401

9004031629

2 - (AR) ACCOUNTS RECEIVABLE

2 - DAILY WORK
3 - ENTER CASH RECEIPTS

DATE 8/1/88 G/L PERIOD 8

CUST ID MAR950 NAME Maryland Victory 88

CHECK # 1026 AMOUNT $ 378.00 (CHECK AMOUNT)

INV # 34 637 (BATCH # (INVOICE #)

G/L NO 10 935 8020 AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

2 0 0 4 0 8 1 1 6 3 1

10935-8020

MARYLAND VICTORY '88
MARYLAND REPUBLICAN PARTY

1026

Aug. 5 1988 65-25 550

PAY TO THE ORDER OF Republican National Committee $ 378.00

Three hundred seventy-eight 00/100 DOLLARS

FARMERS & MERCHANTS BANK OF HAGERSTOWN

FOR Mailing costs

Susan K. Saum Wiebler

"001026" :055000257: 28 132 8"

2 - (AR) ACCOUNTS RECEIVABLE

2 - DAILY WORK
3 - ENTER CASH RECEIPTS

DATE 10/27/88 G/L PERIOD 10

CUST ID MAR950 NAME Maryland Victory 88

CHECK # 1037 AMOUNT $ 485.00
(CHECK AMOUNT)

INV # 62 851
(BATCH # (INVOICE #)

G/L NO 10 950 6360 AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

G/L NO AMOUNT

MARYLAND VICTORY '88
REPUBLICAN ST E CENTRAL COMMITTEE OF MARYLAND
60 WEST STREET, SUITE 201
ANNAPOLIS, MD 21401

1037

September 23 19 88

PAY TO THE ORDER OF Republican National Committee $ 485.00

Four Hundred Eighty-Five and no/100---------- DOLLARS

FARMERS NATIONAL BANK of MARYLAND 02
ANNAPOLIS, MARYLAND

FOR Postage-Reagan mailing

⑈001037⑈ ⑆055000356⑆ 312⑈253 ⑈

Republican
National
Committee

Richard P. Taylor
Member for Maryland
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 429-6459

September 30, 1988

BY HAND

9004031633

Mr. Tom Labrecque
Victory '88 Finance
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

Dear Tom:

Enclosed are checks for $1,000 (J.W. Marriott) and $485 (postage - Reagan mailing).

Sincerely,

Dick

Richard P. Taylor

RPT:bdp
Enclosures

Powell, Roper & Associates, Inc.
7316 Wisconsin Avenue • Bethesda, Maryland 20814

INVOICE

Date: September 19, 1988
Invoice #: 1296
Your Order #:

INVOICE TO:

Republican National Committee
Victory '88
310 First Street, SE
Washington, DC 20003

ATTENTION: Jeff Vogt

TERMS: Due 30 days. If not paid within 30 days a finance charge of 1½% per month will be added which is an annual percentage rate of 18%.

REMIT TO:
7316 Wisconsin Avenue, Suite 507
Bethesda, Maryland 20814

THANK YOU...we appreciate the opportunity of serving you.

Postage Reconciliation: Vice President Bush Letter for Victory '88	
T: 1,760 @ 7.6¢; 889 @ 8.4¢:	$208.44
M: 8,129 @ 7.6¢; 1,609 @ 8.4¢:	$752.96
J: 12,357 @ 7.6¢; 3,529 @ 8.4¢:	$1,167.17
D: 3,377 @ 7.6¢; 1,140 @ 8.4¢:	$390.41
T: 4,549 @ 7.6¢; 882 @ 8.4¢:	$403.01
C: 1,320 @ 7.6¢; 277 @ 8.4¢:	$115.19
I: 1,140 @ 7.6¢; 454 @ 8.4¢:	$124.78
A: 40,197 @ 7.6¢; 2,017 @ 8.4¢:	$3,274.80
A: 100,274 @ 7.6¢; 7,810 @ 8.4¢; 30,094 @25¢:	$16,256.36
D: 17,429 @ 7.6¢; 689 @ 8.4¢:	$1,382.48
D: 4,125 @ 7.6¢; 2,042 @ 8.4¢:	$485.03
D: 11,939 @ 7.6¢; 1,109 @ 8.4¢:	$1,000.52
K: 2,521 @ 7.6¢; 1,065 @ 8.4¢:	$281.40
L: 11,017 @ 7.6¢; 1,290 @ 8.4¢:	$973.83

WHITE - *Original* GREEN - *Remittance Copy* YELLOW - *Accounting Copy* PINK - *File Copy* GOLDENROD - *File Copy*

[illegible], Roper & Associates, Inc.

7316 Wisconsin Avenue • Bethesda, Maryland [illegible]

INVOICE

Date: October 28, 1988

Invoice #: 1401

Your Order #:

INVOICE TO:

[illegible] National Committee
[illegible]
[illegible], DC
[illegible] 20003

[illegible] Jeff Voas

TERMS: Due 30 days. If not paid within 30 days a finance charge of 1½% per month will be added which is an annual percentage rate of 18%.

REMIT TO:
7316 Wisconsin Avenue, Suite 507
Bethesda, Maryland 20814

THANK YOU...we appreciate the opportunity of serving you.

Postage [illegible]	
Package: [illegible]t Reagan followup	
[illegible]	$208.44
[illegible] 8,[illegible] @ [illegible]¢; 1,009 @ 8.4¢:	$752.96
[illegible]	[illegible]
[illegible]	$[illegible]
[illegible]	$[illegible]
[illegible]	[illegible]
[illegible]	$[illegible]
[illegible] 7,810 @ 8.4¢; [illegible] @ 25¢:	$10,255.30
[illegible]	$485.03
[illegible] 1,109 @ 8.4¢:	$1,001.52
[illegible]	$291.19

WHITE – *Original* GREEN – *Remittance Copy* YELLOW – *Accounting Copy* PINK – *File Copy* GOLDENROD – *File Copy*

P 0 0 4 0 3 1 1 5 3 6

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF FREDERICK M. BUSH

Frederick M. Bush, being duly sworn, deposes and says:

1. I reside at 8208 Kerry Road, in the City of Chevy Chase, and State of Maryland.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I directed the Victory '88 finance program as a consultant to the Republican National Committee (RNC).

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where their funds might be better utilized, they were given suggestions or addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88."

4. When checks made out to "Victory '88" were inadvertently sent to the RNC by a contributor, it was the RNC's policy to make an attempt to contact these contributors to determine the intended recipient. When the contributor could be reached, the procedure paralleled that set out in the above paragraph. If the contributor could not be reached, it was the RNC's policy to send the check to the state party of the contributor's home state, as determined by the address on the check or return address on the donor's envelope. The policy of the Victory '88 program was that the donors from the District of Columbia who sent checks to the RNC made out to "Victory '88" were contacted and asked to which state party they wished their checks directed. The direction of the donor was then followed.

5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this 6th day of October, 1989.

Frederick M. Bush

Subscribed and sworn to before me
this 6th day of October, 1989.

Philip A. Guarino

My Commission Expires June 14, 1991

2 0 4 0 1 5 3 3 7

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF MARGARET C. ALEXANDER

Margaret C. Alexander, being duly sworn, deposes and says:

1. I reside at 1016 1/2 Oronoco Street, in the City of Alexandria, and State of Virginia.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I served as a consultant to the Republican National Committee (RNC).

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where they thought their funds might be better utilized, they were given suggestions or addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88."

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5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this 6th day of October, 1989, in Washington, D.C.

Margaret C. Alexander

Margaret C. Alexander

Subscribed and sworn to before me
this 6th day of October, 1989.

Notary Public

My Commission Expires July 14, 1992

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF THOMAS G. LABRECQUE, JR.

Thomas G. Labrecque, Jr., being duly sworn, deposes and says:

1. I reside at 1575 Colonial Terrace, in the City of Arlington, and State of Virginia.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I served the Republican National Committee (RNC) as Victory '88 Regional Finance Coordinator.

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where they thought their funds might be better utilized, they were given suggestions or addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88."

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5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this 6th day of October, 1989, in Washington, D.C.

Thomas G. Labrecque, Jr.

Subscribed and sworn to before me
this 6th day of October, 1989.

GLORIA BROWN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 31, 1994

Notary Public

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF MARILYN B. THOMPSON (PAT)

Marilyn B. Thompson (Pat), being duly sworn, deposes and says:

1. I reside at 11303 Mary Catherine Drive, in the City of Clinton and State of Maryland.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I served the RNC as Executive Assistant in its Victory '88 Finance Division.

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where their funds might be better utilized, they were given suggestions and addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to the particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to be make checks out simply to "Victory '88."

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5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this sixth day of October, 1989.

Marilyn B. Thompson

Marilyn B. Thompson

Subscribed and sworn to before me
this 6th day of October, 1989.

Patricia E. Estep
Notary Public
My commission expires 6/14/90

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 2936

AFFIDAVIT OF JAMES W. SEARS

James W. Sears, being duly sworn, deposes and says:

1. I reside at 3901 Cathedral Avenue, N.W., Apt. 115, in the City of Washington, and District of Columbia.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I served the Republican National Committee (RNC) as a Victory '88 finance staff assistant.

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where they thought their funds might be better utilized, they were given suggestions and addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88."

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5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this 6th day of October, 1989.

James W. Sears

Subscribed and sworn to before me
this 6th day of October, 1989.

Notary Public

My Commission Expires June 14, 1991

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF SANDRA E. BAXTER

SANDRA E. BAXTER, being duly sworn, deposes and says:

1. I reside at 5403 Wycklow Court, in the City of Alexandria, and State of Virginia.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During the period at issue, I served the Republican National Committee (RNC) as Victory '88 Regional Finance Coordinator.

3. The policy of the RNC's Victory '88 Finance Division with respect to Victory '88, as I understood it, was that any donors telephoning the RNC with offers of financial help for the Victory '88 program were handled in one of several manners. If they wished to contribute to their home state's Victory '88 program, they were given the appropriate address in that state. If they did not necessarily wish to contribute to their own state party's program, but to a state where their funds might be better utilized, they were given suggestions and addresses for such contributions. All members of the Victory '88 Finance staff were instructed to have all such checks made out to a particular state's Republican Party in care of that state's Victory '88 account. Members of the Finance staff were further instructed to tell donors not to make checks out simply to "Victory '88."

4. When checks made out to "Victory '88" were inadvertently sent to the RNC by a contributor, it was the RNC's policy to make an attempt to contact these contributors to determine the intended recipient. When the contributor could be reached, the procedure paralleled that set out in the above paragraph. If the contributor could not be reached, it was the RNC's policy to send the check to the state party of the contributor's home state, as determined by the address on the check or return address on the donor's envelope. The policy of the Victory '88 program was that the donors from the District of Columbia who sent checks to the RNC made out to "Victory '88" were contacted and asked to which state party they wished their checks directed. The direction of the donor was then followed.

5. It was the policy of the RNC Victory '88 finance program to routinely process all such checks as soon as they were received, in order to comply with the requirements of federal law.

In witness whereof, I have hereunto set my hand and seal on this 5th day of October, 1989 at San Francisco, California.

Sandra E. Baxter

Sandra E. Baxter

Subscribed and sworn to before me this 5th day of October, 1989.



Sharon F. Roberts

Notary Public

2004081156433

9004081644

Baltimore Evening Sun Wednesday, November 9, 1988

Some fliers pushed Bush ... and Sarbanes, Cardin

From staff and wire reports

Republican campaign money may have helped re-elect at least two Democratic congressional candidates in Maryland.

Campaign leaflets promoting Republican George Bush on the same slate with Sen. Paul Sarbanes, D-Md., and Rep. Benjamin Cardin, D-3rd, were being distributed at some city polling places yesterday. The Republicans running against Sarbanes and Cardin – Alan Keyes and Ross Pierpont – were not mentioned.

The red-on-white leaflets were headed "Democrats for Bush" and carried an authority line that said they were "Paid For By Free State Victory '88 Fund."

Officials at the Federal Election Commission said yesterday the Free State Victory "88" Fund is an organ of the Maryland Republican State Committee, supported by "soft" campaign contributions to the Republican Party. "Soft" contributions are private dollars given to a national party to benefit state committees and their entire slate of candidates.

But Republican State Committee Chairman Daniel Fleming "emphatically" disavowed any connection with the leaflet. "We have no knowledge of it," he said.

"I have no tolerance for a Republican committee that would put out a slate card endorsing Democrats," he said. If one did, "they did it erroneously and without my permission."

He said the "Free State Victory '88 Fund" was not connected to the state GOP's "Maryland Victory '88 Fund," which supports the Maryland party's congressional candidates.

Fleming said he was still trying to find out whether the leaflets were connected in any way to the Republican Central Committee of Baltimore City.

Rachel Flick, a press spokesman for GOP senatorial candidate Alan Keyes, said the Keyes campaign was unaware of the leaflets, but speculated that they were produced by a "fringe group" within the state or city GOP organizations. "Parties are full of lots of people," she said.

"I'm not going to tell you I'm happy about it," she said, adding, "I don't know at what level it was authorized."

In general, she said, the state Republican organization "has been very supportive" of Keyes campaign. Other party literature, she said, "has our name on it."

Residents in Wicomico and Allegany counties yesterday repealed Sunday blue laws allowing stores to open seven days a week, and Cumberland voters narrowly approved a referendum to add fluoride to that city's drinking water.

On the Eastern Shore, voters in Talbot County rejected an increase in property taxes.

Allegany County residents approved a provision 55 percent to 45 percent to allow almost all businesses except car dealers to open Sundays beginning Dec. 15.

Cumberland residents voted 51 percent to 49 percent to end the city's 25-year ban on fluoridation, an issue that sharply divided the community.

2004081645

THE SUN

SUNDAY
APRIL 30, 1989

Bentley kept shift of GOP funds secret to stymie Fleming

By Robert A. Erlandson
Baltimore County Bureau of The Sun

Representative Helen Delich Bentley, with the help of three local Republicans, secretly stashed about $20,000 in presidential campaign funds in the Carroll County Central Committee's federal account, in part to keep the money away from her party rival, state GOP Chairman Daniel E. Fleming.

Half of the money, which was transferred to the Carroll County account just before and after the November election, later was moved to similar accounts in Baltimore and Baltimore County. It was used for such campaign costs as air fares and limousines for guests at fund-raisers, and a computer and printer.

The transfer was legal, but the discovery that it was done secretly has led to a call for the resignation of two members of the Carroll County Central Committee, Chairwoman Sharon Hornberger and Frank Rammes, county chairman of President Bush's Victory '88 campaign.

The only other person in on the secret was Gary W. Bauer, who, though not a committee member, was treasurer of the federal account. He told the Central Committee that it contained as little as $67, though Federal Election Commission records show more than $20,000 was available at times.



THE SUN/1988

HELEN DELICH BENTLEY
Denies having slush fund

Mrs. Bentley, R-Md.-2nd, who headed the Bush campaign in Maryland, said in an interview that the transfers had a dual purpose: to pre-

See **BENTLEY**, 5B, Col. 1

Bentley shifted funds secretly to stymie Fleming

BENTLEY, from 1B

vent the forces of Massachusetts Gov. Michael S. Dukakis, the Democratic nominee, from piecing together the GOP financial picture and to prevent Mr. Fleming from having control of the money.

She said contributions came in during the rift in the GOP caused when Mr. Fleming sent out campaign literature implying that the release of William Horton Jr., a black convicted murderer who raped a white Maryland woman after escaping while on furlough from a Massachusetts prison, proved that Mr. Dukakis was soft on criminals.

Both Democrats and Republicans attacked the literature as racially inflammatory. Mrs. Bentley tried to oust Mr. Fleming as party chairman because of it, saying he represented the far right wing of the GOP while she represented mainstream Republicanism.

"It's part of the Fleming thing," Mrs. Bentley said. "I wasn't going to raise any money to go" to accounts controlled by the state GOP chairman.

Mr. Fleming, who was taken by surprise when he learned of the transfer earlier this month, said he thought Republican leaders had stopped shifting money to federal accounts separate from those maintained at party headquarters in Annapolis after he blocked a similar move last summer in Hagerstown.

"I assumed that all money from Victory '88 was deposited in Annapolis," Mr. Fleming said. "I had no clue any shenanigans were going on."

The state party is awaiting the results of a Carroll County Central Committee investigation and will conduct its own probe, he said.

Ms. Hornberger, an aide to state Sen. Raymond E. Beck, R-Carroll, initially refused to discuss the dispute. She later admitted that she agreed to cooperate when Mrs. Bentley asked her to be a conduit for the money and to disclose it only on a

> *"I assumed that all money from Victory '88 was deposited in Annapolis. I had no clue any shenanigans were going on."*
>
> **DANIEL FLEMING**
> **State GOP chairman**

Mrs. Bentley said she set the "need to know" policy along with Richard P. Taylor, the GOP national committeeman and Bush finance chairman in Maryland, where $400,000 was raised for Mr. Bush.

"In a campaign, when you're working on things, you don't want to tell everyone," Mrs. Bentley said. "There are things in my own campaign I don't tell everyone."

She conceded, however, that "there were probably some errors made" in hiding it from Carroll County Central Committee members.

The Carroll County account was chosen, even though the county is not in Mrs. Bentley's congressional district, because it had been established earlier in 1988 than its counterparts in Baltimore and in Baltimore County.

"You have more flexibility with an older account, and we were operating a full-speed election," Mrs. Bentley said.

The secret transfers surfaced earlier this month after members of the Central Committee were rebuffed when they tried to close the account because they thought it had so little money that filing FEC reports was a waste of energy.

Ms. Hornberger finally admitted to one member that there was more money than they had been told about and asked him to keep it quiet. But he refused and told committee member Joseph M. Getty, who verified the amount in the account through FEC reports.

Mr. Getty has submitted recommendations to fellow members seeking the resignations of Ms. Hornberger and Mr. Rammes from the committee or their expulsion from the party. Mr. Bauer already has been removed as treasurer of the federal account.

"The fraudulent actions and lack of sensible judgment shown by the members involved in this activity casts a deep shadow over the integrity of this committee," Mr. Getty said.

The law does not provide for removal of members or punitive actions against committee members, Mr. Getty acknowledged, but he suggested that "the members who engaged in fraudulent activity ... should take it upon themselves personally to resign from the committee."

Mr. Getty recommended that if Ms. Hornberger and Mr. Rammes refuse to resign — both declined to discuss that possibility — the Central Committee send a motion to the state GOP to expel them at the spring party convention May 12-13.

After the money transfers were revealed, the Central Committee members made a pact of public silence until after the next meeting, May 4, when Ms. Hornberger's explanation was to be given.

However, some members eventually agreed to talk when *The Sun* got word of the transfer and verified it through FEC reports.

Ms. Hornberger said Mrs. Bentley and Mr. Taylor assured him that the money transfer was legal, that it had been done in Maryland in the 1980 and 1984 presidential campaigns and that it would be done nation-

"I was told this practice of distributing receipts allowed flexibility," Ms. Hornberger said. "It was hoped it would keep the Dukakis forces from readily ascertaining the financial strength of the Bush campaign and Victory '88 and make it more difficult for the Dukakis forces to second-guess what was happening in Maryland."

"It was my desire to do all in my power within the law to help elect George Bush and assist the Republican Party," said Ms. Hornberger, who was elected 4-3 over Mr. Getty in December to chair the Central Committee and reportedly has political ambitions.

"I had knowledge of it, but it was legally raised, and since we have been having other [internal] problems, we didn't feel it necessary to make it known to the others," Mr. Rammes said.

Mrs. Bentley denied that the account was a slush fund. "How can it be a slush fund when everything was duly reported?" she said.

An FEC spokesman said transferring federal-account funds is permitted under the law as long as it is disclosed, as was done in this case.

About half of the money was transferred quietly from Carroll County to similar accounts in Baltimore and Baltimore County and used to pay various campaign expenses, according to FEC records and participants.

Among expenses paid for from the Carroll County account were $2,012 to bring former actor and ambassador to Mexico John Gav from California to Howard Cou for a fund-raiser at the home of veloper Kingdon Gould and $460 a limousine to transport him. An a ditional $1,500 was spent on a b to carry a party of Marylanders President Bush's inauguration January.

The Baltimore County committ a one-woman operation run by lo time Bentley ally Marjorie Neum of Parkville, used most of its mon for a computer to maintain pa registration and other rec

The Baltimore com ee us $1,452 of the money to buy a print for the computer and $2,000 to p off a printing bill for a campaign fl distributed in Prince George's Cou ty, said treasurer Linda Bowler Pi son.

David K. Blumberg, the city pa chairman, said he informed members of the cash infusion.

Mrs. Bentley and Mr. Taylor s there were many contributors, so of them prominent Democrats, w wanted to contribute to the Bu campaign but would not give direc through the state GOP either cause of antipathy to Mr. Fleming because they did not want th names on the party contributor lis

Among the best known contrib tors, who gave $1,000 to t Carroll County account, were Hen A. Rosenberg Jr., head of Crov Central Petroleum; Lawrence R. R chuba, a prominent Towson dev oper; and W. Dale Hess, a develop and former state delegate who w jailed for political corruption alo with former Gov. Marvin Mand Their convictions were later ove turned.

The Drive Political Fund, a Tea sters union political action comm tee in Washington, gave $5,000, a Ron Burkhead and Clyde Hendric of the Tudor Manor Partnership Del Air, gave $2,000.

GOP official to explain transfers of secret accounts



SHARON HORNBERGER
Will answer to GOP committee

By JORDIE WOODWARD
Staff Writer

The chairperson of the Carroll County Republican Central Committee has been asked to explain how $20,000 in contributions to the Bush campaign — money received from Democrats and from sources outside Carroll — were kept off committee reports.

Contributions were transferred secretly from the Victory '88 campaign — the Maryland effort to elect Vice President Bush — to the committee's federal account with the help of chairperson Sharon Hornberger and committee member Frank Rammes.

The secrecy extended to submitting different account reports to the committee and to the Federal Election Commission. The committee received a report on how much county money was in the account and the FEC received information on the total amount of funds in the account.

Both Hornberger and Rammes said they believed placing the funds in the account and filing different reports was legal.

"I was assured by both chairwoman [Helen] Bentley and the national commiteeman [Richard] Taylor that such use was legal and was a formula that had been practiced in Maryland during the presidential elections in 1980 and 1984, and would again be used throughout the country in the current 1988 cycle," Hornberger's letter states.

Hornberger's letter also states funds were diverted to the local account to keep Dukakis campaign managers from gauging the true strength of the Maryland effort to elect Bush.

Rammes said some contributions were made by "prominent Democrats who did not want to give to the state [GOP] party."

Committee members have asked Hornberger to explain during the committee's regularly scheduled May 6 meeting why she kept the information from the five other members. The committee also has asked her to submit a written statement answering a number of specific questions concerning the origin and disbursement of the money.

Don Taylor, vice chairman of the Carroll committee, said Saturday that Hornberger responded by letter to those questions, but said more clarification is needed.

Although one member has recommended that the committee ask for the resignation of Hornberger and Rammes, Taylor said more information is needed before the committee

Please see GOP, A2

Carroll County Times
Sunday, April 30, 1989

GOP

From A1

takes any action.

Both Hornberger and Rammes said Saturday that their actions were legal and they will not resign if asked. "There are no grounds for me to resign, so I will not resign from the central committee," Hornberger said.

Committee member Joseph Getty said Saturday that Hornberger's letter did not answer all the questions asked during the special meeting. He said she was asked to list the source of the receipts that came from outside the county, the nature of the expenditures made outside the county, the people involved in making the decision about placing the funds in the account, the reason why it was done and the reason why it was concealed from most of the members.

Getty said the letter repeats what Hornberger said at the special meeting.

However, Hornberger argued the letter answers the questions.

Hornberger said she made the decision to keep knowledge of the transfers on a "need-to-know" basis. She said she was approached in March of 1988 by Richard Taylor, national committeeman for the state, and finance chairman for Maryland's Victory '88 campaign, about using the county federal account for contributions from the presidential campaign that were made by Democrats.

She said most of the contributions were from people and partnerships that did not want to appear on the state GOP contributors list, since some were likely to be prominent Democrats.

Hornberger said both Taylor and Bentley made the decision that only members of the Victory '88 campaign the Bush campaign and the central committee should be told about the account transfers.

"Need-to-know" was cited as the basis for discussing the details with anyone outside of the camaign," she said.

Rammes was the only committee member actively involved in the campagin, said Hornberger, and he was the only committee member informed. Hornberger also discussed the mater with the treasurer of hte federal account, Gary Bauer.

"Sharon Hornberger made a political decision and I backed her up," said Rammes.

Taylor and other committee members said they are not satisfied that the actions are legal. "It is not one of the things we have been able to determine," he said.

Getty objected to separate books being used. He called the action deceptive and manipulative. On Dec. 1, 1988, the committee was told there was $1,359 in the account, but a Nov. 21 FEC report listed $20,924. The committee was told on Feb. 2 that there was $87 in the account, but on Jan. 31, 1989, the FEC had $13,490 reported.

Getty said the committee was very concerned about not being told about the transfers because all members are liable for violations of FEC regulations.

He also was concerned about the matter lending an appearance of wrongdoing within the committee.

Hornberger disputed that there was an appearance of wrongdoing.

"Our main concern is that Carroll County actually handled campaign funds that have no relevance to Carroll County," he said.

The Washington Times

Monday,
May 1, 1989

LOCAL ROUNDUP

MARYLAND

Bentley, GOP workers secretly moved money

Rep. Helen Delich Bentley enlisted three GOP workers to secretly transfer about $20,000 in presidential campaign funds to the Carroll County Central Committee's federal account, in part to keep the money from party rival and state GOP Chairman Daniel E. Fleming.

The Baltimore Sun reported yesterday that the funds, transferred to the Carroll County account just before and after the November election, were moved later to similar accounts in Baltimore and Baltimore County to pay for such campaign costs as air fares and limousines for guests at fundraisers, and a computer and printer.

While legal, the transfer has led to a call for the resignation of two members of the Carroll County Central Committee: Chairwoman Sharon Hornberger and Frank Rammes, county chairman of President Bush's campaign, the newspaper said. The only other person in on the secret was Gary W. Bauer, treasurer of the federal account.

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Carroll GOP rejects version of secret funds

By Sheridan Lyons
Carroll County Bureau of The Sun

WESTMINSTER — The Carroll County Republican Central Committee voted 5-1 last night to reject its chairwoman's explanation of the secret use of the committee's federal account to stash about $20,000 raised for the 1988 presidential campaign.

Committee members Joseph M. Getty, vice chairman Donald Taylor and treasurer Louis Wiser said they didn't believe the reasons Sharon Hornberger gave for allowing the use of the account for the campaign funds, and they criticized her for putting them at risk of being liable for any financial irregularities resulting from an action they knew nothing about.

The group, after grilling Ms. Hornberger for about two hours, voted to reject her letter of explanation and to ask her additional detailed questions in writing.

In the April 27 letter, Ms. Hornberger said she was asked last year by Representative Helen Delich Bentley, R-Md.-2nd, and Richard P. Taylor, GOP national committeeman and President Bush's finance chairman for Maryland, to allow use of the committee's account to hide the campaign's strength from Democratic presidential candidate Michael S. Dukakis and to protect prominent Democrats who wanted to contribute to the Bush campaign but not to the state Republican Party.

A story in *The Sun* last week disclosed that Mrs. Bentley secretly had transferred the money into the committee's account, in part to keep it away from her party rival, state GOP Chairman Daniel E. Fleming. The transfer was legal but has led to a call for Ms. Hornberger's resignation and for that of Frank Rammes, county chairman of President Bush's Victory '88 campaign.

Ms. Hornberger said last night that, although Mrs. Bentley had asked her to disclose the use of the account only on a "need to know" basis, she showed "poor judgment"

See **COMMITTEE**, 8E, Col. 5

THE SUN

FRIDAY
MAY 5, 1989

Chairwoman's version rejected over use of Carroll GOP fund

COMMITTEE, from 1E

in agreeing to conceal its use from the rest of the committee.

"What motive clouded that judgment?" Mr. Wiser asked. "This is such an important matter: You bring everything else to the committee; you don't make major decisions involving the committee and its responsibilities on your own.

"I can't accept this report as the actual reason for why it was handled the way it was," he said.

Mr. Wiser and Mr. Getty cited specific deposits and withdrawals that concerned them, but Ms. Hornberger insisted there was no improper use of the money in the account.

"A lot of money appears to have been received to get George Bush elected after the fact," Mr. Wiser said. "My point is, all these dates, your letter doesn't hold water with all these dates. It leaves me with that taste that you are trying to cover something — what?" he asked.

"You are wrong," Ms. Hornberger responded.

"I knew you'd say that," Mr. Wiser said, smiling.

Committee members learned that the account had been used for presidential campaign funds last month when they attempted to close it, believing it contained only $87, and discovered that it had held more than $20,000. Although the committee had not been told of the transfers, the full amount in the amount had been reported to the federal elections commission.

GOP committee rejects reason for secret funds

WESTMINSTER, Md. (AP) — The Carroll County Republican Central Committee has overwhelmingly rejected its chairwoman's explanation of her decision to allow Rep. Helen Bentley to hide $20,000 in presidential campaign funds in the committee's account without the committee's knowledge.

It was disclosed last week that Rep. Bentley, R-Md., secretly transferred the money into the committee's account, in part to keep it away from her party rival, state GOP Chairman Daniel E. Fleming. The transfer was legal but has led to a call for the resignation of Chairwoman Sharon Hornberger and of Frank Rammes, county chairman of President Bush's Victory '88 campaign.

By a 5-1 margin yesterday, the committee voted to reject Ms. Hornberger's letter of explanation and query her for additional details in writing.

Committee members Joseph M. Getty, Donald Taylor and Louis Wiser said they did not believe the reasons Ms. Hornberger gave for allowing the use of the account for the campaign funds. They also criticized her for putting them at risk of being liable for any financial irregularities resulting from an action they knew nothing about.

In the April 27 letter, Ms. Hornberger said she was asked last year by Rep. Bentley and Richard P. Taylor, GOP national committeeman to allow use of the committee's account to conceal the campaign's strength from Democratic presidential candidate Michael S. Dukakis. The other reason cited was protection of prominent Democrats who wanted to contribute to the Bush campaign but not to the state Republican Party.

Ms. Hornberger said yesterday that although Rep. Bentley had asked her to disclose the use of the account only on a "need to know" basis, she showed "poor judgment" in agreeing to conceal its use from the rest of the committee.

Committee members learned that the account had been used for presidential campaign funds last month when they attempted to close it, believing it contained only $87, and discovered that it had held more than $20,000. Although the committee had not been told of the transfers, the full amount in the account had been reported to the Federal Elections Commission.

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GOP panel rejects chairman's fund-transfer explanation

0040811652

By JORDIE WOODWARD
Staff Writer

The Carroll County Republican Central Committee voted Thursday night to reject its chairman's written explanation of why outside contributions to the committee's federal account were kept from five members.

In separate motions, the committee also voted to allow members who still have questions about the way the federal account was handled to submit written questions to the chairman through the secretary. The chairman then must answer all questions in writing.

It also voted to close the federal account as soon as the Federal Elections Commission is satisfied the reporting to the account is complete.

During the meeting committee vice-chairman Don Taylor said checks in the account were originally made to the Victory '88 account and that someone other than the check writer had added the initials of the committee federal fund on the checks. Then federal account treasurer Gary Bauer said he received the checks with the initials on it.

After more than two hours of questioning about how the federal funds were handled and why the transactions were kept secret, committee chairman Sharon Hornberger told members she made a mistake.

"It was not a good decision," she said. "Hindsight 20-20 — obviously it was a bad decision."

Although he didn't elaborate, committee treasurer Lou Wiser, who was not told of the federal transactions, asked Hornberger what her motives were. "What motive clouded that judgment," he said.

Hornberger answered that she did it so that funds that contributors might not give to the state party could be raised to pay for election expenses.

In her written response, Hornberger said the transfers were made so that contribution from prominent Democrats would not appear on the state GOP account listing. She also said that contributions were channeled through the Carroll and two other central committees to disguise the strength of the Bush campaign in Maryland from the Michael Dukakis campaign.

However, several committee mem-

Please see GOP, A3

State says no laws were broken

By JORDIE WOODWARD
Staff Writer

Although members of the Carroll County Republican Central Committee have questioned the legality of the chairman allowing secret transfers of outside funds into the federal account, the office of the state prosecutor is not conducting an investigation.

Bernard Penner, assistant state prosecutor, confirmed Thursday that committee member Joseph Getty had contacted the prosecutor's office about possible illegalities in the reporting of the funds to the committee. However, he said the information Getty gave him did not warrant an investigation. "We are not taking any action," he said.

Sharon Hornberger, central committee chairman, allowed the secret transfers of outside presidential campaign funds to the federal account. The account transactions were kept from the five members of the committee who were not actively involved in the Bush campaign.

Separate books were kept, said

Please see Legality, A3

GOP

From A1

bers questioned the validity of her reasoning, pointing out that the bulk of the contributions were deposited in the account shortly before and after the presidential elections.

Getty also questioned whether most of the contributors were prominent Democrats and pointed out that some were Republicans.

Hornberger said she could not determine the party of the contributors since she did not collect the funds. She said the solicitation was handled by Rep. Helen Bentley, campaign chairperson for both the Victory '88 and Bush campaigns, and Richard Taylor, national committeeman and finance chairman for Victory '88.

She also said Bentley and Taylor handled decisions about which central committee the checks were deposited and how the funds would be spent.

"We did not raise funds," she said. "We acccepted the funds and served as a conduit."

Getty asked how the $20,000 in the account could possibly confuse the Dukakis campaign when the state raised more than $400,000 for the Bush campaign.

Hornberger said that Carroll wasn't the only central committee receiving funds, Baltimore County and city committees were also involved.

Wiser asked why the Baltimore central committee chairman told its members about the funds transfers if, as Hornberger has said, Bentley advised knowledge of the transfers should only be on a need-to-know basis.

Hornberger replied she did not know what that chairman was told.

When asked why the bulk of the funds were deposited shortly before and after the election, Hornberger the funds came in. She said the commitment for the funds was made earlier and that the contributors were late in sending the checks.

She said the funds were needed for election expenses which had carried over after the election.

According to Getty, the funds were used for travel expenses for Ambassador John Gavin, limousine service for Bentley and Gavin, postage and computer rentals.

He questioned whether they were expenses really related to the campaign.

Hornberger said the money was important to the overall campaign effort and that excess money was necessary for party building.

She said about $11,000 of the money, which was transferred to the Baltimore County Victory '88 Fund and the Freestate Victory '88 Fund in February and March, was used to buy a computer for the

Legality

From A1

Getty — an accurate account was submitted to the FEC and another report was compiled for the committee, showing only transactions of county-raised funds.

As long as the account transactions were reported accurately to the Federal Election Commission, however, there is no violation of public disclosure laws, Penner said.

Although the attorney general's office couldn't offer an opinion on the matter, an attorney there said no laws appear to have been broken.

Elona Sheffey-Rawlings said at most, it appeared to be a violation of the spirit of the committee's internal rules. Although the charter and bylaws of central committees must be registered with the state, the state has no enforcement powers of those bylaws.

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THE SUN

SATURDAY,
MAY 6, 1989

Carroll GOP chairwoman discredited

By Sheridan Lyons
Carroll County Bureau of The Sun

WESTMINSTER — The Carroll County Republican Central Committee voted 5-1 Thursday to reject its chairwoman's explanation of the secret use of the committee's federal account to stash about $20,000 raised for the 1988 presidential campaign.

Committee members Joseph M. Getty, vice chairman Donald Taylor and treasurer Louis Wiser said they didn't believe the reasons Sharon Hornberger gave for allowing the use of the account for the campaign funds, and they criticized her for putting them at risk of being liable for any financial irregularities resulting from an action they knew nothing about.

The group, after grilling Ms. Hornberger for about two hours, voted to reject her letter of explanation and to ask her additional detailed questions in writing.

In the April 27 letter, Ms. Hornberger said she was asked last year by Representative Helen Delich Bentley, R-Md.-2nd, and Richard P. Taylor, GOP national committeeman and President Bush's finance chairman for Maryland, to allow use of the committee's account to hide the campaign's strength from Democratic presidential candidate Michael S. Dukakis and to protect prominent Democrats who wanted to contribute to the Bush campaign but not to the state Republican Party.

The GOP Central Committee didn't believe the reasons Sharon Hornberger gave for allowing the use of its federal account for campaign funds.

An article in *The Sun* last week disclosed that Mrs. Bentley secretly had transferred the money into the committee's account, in part to keep it away from her party rival, state GOP Chairman Daniel E. Fleming. The transfer was legal but has led to a call for Ms. Hornberger's resignation and for that of Frank Rammes, county chairman of President Bush's Victory '88 campaign.

Ms. Hornberger said last night that, although Mrs. Bentley had asked her to disclose the use of the account only on a "need to know" basis, she showed "poor judgment" in agreeing to conceal its use from the rest of the committee.

"What motive clouded that judgment?" Mr. Wiser asked. "This is such an important matter: You bring everything else to the committee; you don't make major decisions involving the committee and its responsibilities on your own.

"I can't accept this report as the actual reason for why it was handled the way it was," he said.

Mr. Wiser and Mr. Getty cited specific deposits and withdrawals that concerned them, but Ms. Hornberger insisted there was no improper use of the money in the account.

"A lot of money appears to have been received to get George Bush elected after the fact," Mr. Wiser said. "My point is, all these dates, your letter doesn't hold water with all these dates. It leaves me with that taste that you are trying to cover something — what?" he asked.

"You are wrong," Ms. Hornberger responded.

"I knew you'd say that," Mr. Wiser said, smiling.

Committee members learned that the account had been used for presidential campaign funds last month when they attempted to close it, believing it contained only $87, and discovered that it had held more than $20,000. Although the committee had not been told of the transfers, the full amount in the amount had been reported to the federal elections commission.

"Won't you admit that it looks suspicious?" Mr. Getty said of the transfers. "And that we are responsible as members of the committee?" Mr. Wiser added.

Afterward, Ms. Hornberger said the meeting had gone about as she had expected and that she had not worried about being ousted because the bylaws don't permit such action by the committee.

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THE CAPITAL, Saturday, May 6, 1989

REGIONAL BRIEFS

Committee rejects GOP explanation

WESTMINSTER — The Carroll County Republican Central Committee has overwhelmingly rejected its chairwoman's explanation of her decision to allow Rep. Helen Bentley to hide $20,000 in presidential campaign funds in the committee's account without the committee's knowledge.

A story in *The Sun* last week disclosed that Rep. Bentley, R-Md., secretly transferred the money into the committee's account, in part to keep it away from her party rival, state GOP Chairman Daniel E. Fleming. The transfer was legal but has led to a call for the resignation of chairwoman Sharon Hornberger and of Frank Rammes, county chairman of President Bush's Victory '88 campaign.

By a 5-1 margin Thursday, the committee voted to reject Ms. Hornberger's letter of explanation and query her for additional details in writing.

Committee members Joseph M. Getty, Donald Taylor and Louis Wiser said they did not believe the reasons Ms. Hornberger gave for allowing the use of the account for the campaign funds. They also criticized her for putting them at risk of being liable for any financial irregularities resulting from an action they knew nothing about.

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Carroll Co Times → 6-6-89

GOP

From A1

rately from the state Republican Central Committee.

Newman said the information is under the control of a "loosely-knit" group which controlled the Bush campaign. Bentley was the chairwoman of the campaign.

Newman said the grassroots group does not meet or hold elections. "There's nothing on paper," she said. "It's just there."

She said she realized the structure of the group was unusual.

Although there are differences between Bentley-led forces and a faction headed by state committee chairman Dan Fleming, Newman said access to the information is available to any serious Republican candidate or organization.

If a candidate from the Fleming side were to ask for help, she said there will be no problem. "I see no problem helping any candidate."

Hornberger said she was unaware of the location of the computer in Baltimore County. However, she said the computer would be under the control of the national committee people — Bentley and Taylor. "They raised the funds," she said.

She said that the funds used to buy the computer were from the Victory '88 organization, which is part of the Maryland Republican Party and thus the state central committee.

She said the computer was purchased so the information collected during the campaign can be maintained and updated, providing a web of contacts for the next federal election.

She said campaign workers had to start over during the last election because none of the information was stored.

The information also will be available for state and local campaigns, she said. Hornberger said she was told it will be available to all Republicans.

Jacoby said the Zenith 386 computer has an 80 megabyte hard drive needed to maintain statewide lists. The system also has a commercial-size printer. It includes two disk drives to provide compatiblity with volunteers who work on personal computers.



REP. HELEN D. BENTLEY
Victory '88 chairwoman

She said the information is stored so that various lists can be created, down to the type of volunteer work the person is willing to handle to whether the person is a contributor.

She said she works mostly with county central committee chairmen and Maryland Federated Republican Women.

She said that none of the state central committee officers have shown any interest in the computer work. "I would work with Annapolis if they would work with me, but they don't seem the least bit interested," she said.

Hornberger said that could be because of the lack of political activity now, since state elections don't come up until 1990.

Secret GOP money used for Bush lists

By JORDIE WOODWARD
Staff Writer

A portion of the $20,000 secretly placed in the Carroll County Republican Central Committee federal account was used to develop lists of Bush campaign volunteers and contributors, and to buy a computer to maintain the information.

During a meeting of the committee Thursday night, chairwoman Sharon Hornberger told members that $10,000 was transferred to the the Baltimore County Victory '88 Fund. Another $5,000 sent to the Baltimore city Freestate Fund in February was used to buy a computer system and printer.

According to Federal Elections Commission records, $3,832 also was disbursed after the election to pay for computer services: $2,632 was paid to Leslie Jacoby, a volunteer who lives in Parkville, for her time in developing the database during the campaign and supplies for her personal computer which was used at campaign headquarters.

Marge Newman, a member of the Baltimore County Republican Central Committee, received $1,200 for computer rental; however, she said Friday the money was paid for her services in developing the lists.

Hornberger allowed more than $20,000 in outside presidential campaign funds to be placed in the committee's federal account without the knowledge of five of the seven members on the committee. The funds were controlled by Rep. Helen D. Bentley, chairwoman of the Victory '88 and Bush campaigns, and state committeeman Richard Taylor, finance chairman of Victory '88.

Jacoby said she is keeping the new computer system at her home temporarily because it is convenient for her schedule.

Taylor said Friday that Bentley authorized the purchase of the computer. Bentley, the 2nd District Republican Congresswoman representing parts of Baltimore and Harford counties, was out of town Friday and could not be reached for comment.

According to both Newman and Jacoby, the information was developed and is being maintained sepa-

Please see GOP, A3

The Evening Sun

Baltimore, Monday, May 8, 1989

Party-busting

"It was my desire to do all in my power within the law to help elect George Bush and assist the Republican party." So says Sharon Hornberger, chair of the Carroll County Republican Central Committee. Loyalty has become an excuse for covert operations of all types. And the lesson has not been lost on Maryland.

It is no secret that for the past two years, the state GOP has been torn apart by a rift between the party's right wing (symbolized by state party chairman Daniel Fleming) and its more moderate faction (led by Rep. Helen Bentley, from the state's second district.) But the power grab got out of hand. Last summer, Bentley, Richard Taylor, Bush's state campaign chairman, and Susan Saum-Wicklein, the state GOP treasurer, opened a GOP account for candidate Bush in Hagerstown, which they controlled. When Fleming found out, he was livid, and the triumvirate agreed to close the account and transfer all money to the party's Victory 88 account in Annapolis. But they didn't.

Bentley and three local Republicans turned right around and secretly stashed $20,000 in presidential campaign funds in the Carroll County Central Committee's federal account. Bentley says one reason was that she wanted to make it difficult for Governor Dukakis' supporters to find out how much money the Maryland GOP had for Bush. Uhhhh huh.

The more believable reason, which Bentley admits, is that a flurry of contributions came during the rift in the party over Fleming's release of controversial campaign literature concerning the release of Willie Horton, a black murderer who raped a white Maryland woman while on furlough from a Massachusetts prison.

Bentley exacted pledges of secrecy from Hornberger (whom she then recommended for a federal job) and Frank Rammes, county chairman of the Bush's Victory '88 campaign, who misled their other five colleagues about the money in the account. Gary Bauer, treasurer of the federal account, produced phony reports to perpetuate the fraud on the rest of the committee.

The transfer of funds was perfectly legal, and the money was indeed used for justifiable campaign expenses. But that hardly mitigates the sleaze factor. Or the deception. The irony, of course, is that Bentley's effort to build the party ended in party-busting in a county where the GOP was strong; at a Central Committee meeting Thursday, angry members voted 5-1 to reject an explanation Hornberger had concocted. In the name of the public trust, Hornberger and Taylor should immediately resign. And Bentley should learn to play politics in the light of public scrutiny.

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The Evening Sun

Baltimore, Wednesday, May 10, 1989

Editorials

Carroll's GOP

In an editorial on May 8 we mixed up the names of Frank Rammes, Carroll County chairman of the Bush Victory '88 campaign and Richard Taylor, state finance chairman of the Victory '88 campaign. Nevertheless, our conclusion stands: Rammes and Sharon Hornberger, chair of the Carroll County Republican Central Committee, should resign.

Hornberger and Rammes misled their colleagues about hiding $20,000 of state presidential campaign funds in the Carroll County Central Committee's federal account, and last week committee members cast a 5 to 1 vote of no-confidence in Hornberger's explanation. With the Spring Convention of the Maryland State Republican Central Committee this weekend, Carroll's secret account, and the divisiveness it sparked, is bound to be an issue. Now, more than ever, Hornberger and Rammes should step down.

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State GOP splits over charges of check altering

By John W. Frece
Sun Staff Correspondent

OCEAN CITY — The chairman of the bitterly divided state Republican Party said last night that he believes checks for campaign donations during the 1988 George Bush campaign in Maryland were altered — possibly illegally — in an effort by other top party officials to keep the existence of the money a secret.

Opening a contentious argument on the first night of the state GOP's annual spring convention here, Daniel E. Fleming also said his review of Federal Election Commission records indicates that as much as $69,000 in donations intended for Mr. Bush's statewide campaign ended up in a separate Baltimore fund. About $50,000 of that money ultimately was distributed to Democratic organizations for literature promoting Democratic candidates for the U.S. Senate and House, he said.

Such money — plus about $20,000 unspent by Election Day — should have been spent on Republican candidates and could have meant the difference between winning and losing elections, such as the close 1st District congressional race, he said.

"The argument could be made [party officials] did things illegally," Mr. Fleming said. "At the very least, they violated the trust of the party."

Mr. Fleming, conservative head of the right-wing faction of the party, confirmed two weeks ago that his office was investigating a similar shift of $20,000 in campaign funds to the Carroll County Central Committee's federal account — a shift his party rival, U.S. Representative Helen Delich Bentley, R-2nd, admits she helped engineer, in part to keep the money out of Mr. Fleming's hands.

Last night, however, the party's ruling Executive Committee voted 18 to 7 to include both Mrs. Bentley and National Republican Committeeman Richard P. Taylor, who also was aware of the shifting of funds, on the investigation committee along with Mr. Fleming. That drew cries of outrage from James C. Wright, a Fleming ally and chairman of the Anne Arundel County Republican Central Committee, who complained that the GOP was naming the targets of the investigation to do the investigating.

> *"The argument could be made [party officials] did things illegally. At the very least, they violated the trust of the party."*
>
> **DANIEL E. FLEMING**
> **State GOP chairman**

Just before last night's meeting began, Mr. Wright labeled the secret funds "a laundering scheme" and said he believed the way the money was spent was contrary to federal election laws.

Mrs. Bentley said after last night's meeting that she was certain nothing illegal was done during the campaign. She said she was gratified with the confidence demonstrated in her and Mr. Taylor by the lopsided vote.

She said she also has discussed the allegedly "altered" checks with officials of the Republican National Committee and has been assured nothing improper was done.

Mr. Fleming said he has reviewed copies of checks written to Mr. Bush's "Victory '88" campaign, but which were altered on the "pay to the order of" line to read: "CCRCC-FA." Those initials, he said, stand for Carroll County Republican Central Committee, Federal Account. He said he did not know who may have altered the checks.

As a result of publicity about the secret Carroll County funds, he said, his office has received letters from donors demanding to know why their contributions ended up there and not in the state campaign fund.

He quoted from a letter he said he received from Daniel Oliver, chairman of the Federal Trade Commission: "What I want to know is, what happened, who did it and why?"

As party chairman, Mr. Fleming said he had an obligation to raise the

See **GOP**, 6A, Col. 3

THE SUN
BALTIMORE, MARYLAND
SATURDAY
MAY 13, 1989
SPORTS FINAL

THE SUN

MAY 13 1989

GOP split over charges of check altering

GOP, from 5A

issue before the Executive Committee.

"The Republican Party is making gains, while the Democrats have basically self-destructed on ethical grounds," he said. "But as state party chairman, I will not cover anything up. As the Executive Committee of the state party, we need to know what is going on."

Mrs. Bentley sat silently through most of the two-hour meeting, while others debated what, if anything, should be done, squabbled over parliamentary procedure and gave impassioned speeches about party loyalty and the damaging effects of such a public fight.

Ultimately, Mr. Fleming reluctantly agreed to include Mrs. Bentley and Mr. Taylor on his committee but said he intends to include others as well.

"All I ask," Mrs. Bentley said, finally entering the discussion, "is that if you add more people, add them from both sides."



THE SUN

DANIEL E. FLEMING
Probing shift of funds



THE SUN

HELEN DELICH BENTLEY
Named to investigating committee

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THE SUN
LIGHT · FOR · ALL
BALTIMORE, MARYLAND
SUNDAY
MAY 14, 1989

State GOP avoids fight over funds

Fleming camp stays quiet over diversion

By John W. Frece
Sun Staff Correspondent

OCEAN CITY — Maryland's ideologically divided Republicans restrained themselves yesterday, concluding their two-day spring convention without the damaging floor fight over secret diversions of campaign funds many feared could further splinter the state party.

"I think we held it all under control," said Representative Helen Delich Bentley, R-2nd, Maryland's GOP national committeewoman, who has personally been at the center of the latest fight between the party's new-right, fundamentalist Christian faction and the more traditional conservative and moderate wing that she represents.

Friday night, the ruling executive committee engaged in a contentious dispute over whether Mrs. Bentley and GOP National Committeeman Richard P. Taylor had acted improperly by secretly diverting at least $89,000 in campaign donations intended for the 1988 Republican presidential campaign to federal accounts in Carroll County and Baltimore specifically to help George Bush.

Although the diversion was apparently legal, it has set off an uproar within the party because Mrs. Bentley admitted that one reason for the shift was to keep the funds out of the hands of her rival, state party Chairman Daniel E. Fleming.

Against Mr. Fleming's wishes, the executive committee voted Friday night to have Mrs. Bentley and Mr. Taylor assist Mr. Fleming in investigating the shift of funds they had jointly engineered.

See GOP, 6B, Col. 3

GOP quiet over funds

GOP, from 1B

Outraged Fleming allies were expected to ignite the controversy again yesterday by asking the 173 delegates to the state convention to reverse the executive committee's action.

But the controversial issue never came up, apparently partly out of fear that that would prompt Fleming opponents to revive a move for his ouster.

"There was a tremendous undercurrent in here," Mr. Fleming said after the tense meeting. "Both sides were poised like rattlesnakes."

But rather than air the party's dirty laundry in public again, the two factions seemed content to demonstrate their muscle on less contentious matters.

The only roll-call vote of the day, for instance, came in a dispute over whether the word "immediately" should be included in a state party resolution calling on President Bush to pardon Oliver L. North. The word "immediately" was dropped.

By voice vote, the Republicans also adopted an anti-union resolution calling for a "right-to-work" law in Maryland — a stance Republicans from unionized areas of the state said they feared could backfire.

The convention then tabled a resolution urging the Supreme Court to overturn or significantly restrict its Roe vs. Wade abortion decision. Even some anti-abortion delegates saw the potential divisiveness of the resolution and urged its defeat.

THE SUNDAY TIMES

Salisbury, Maryland

DELMARVA'S LARGEST NEWSPAPER

SUNDAY

May 14, 1989

Republicans At War

Maryland GOP Battles Self At Spring Convention

OCEAN CITY (AP) — Maryland's bitterly split Republican Party opened its annual spring convention with its chairman, conservative Daniel E. Fleming, hurling charges that some party officials may have illegally altered contribution checks to keep existence of the money secret.



Fleming

Fleming said his review of federal elections records indicated to him that as much as $69,000 in donations intended for George Bush's Maryland campaign ended up in a separate Baltimore fund, a Baltimore newspaper reported Saturday.

About $50,000 of the money, according to Fleming, was channel to Democratic organizations for literature promoting Democratic candidates for the U.S. Senate and House.

Fleming said that money if spent on Republican campaigns might have made the difference between winning and losing in some races, including the 1st District congressional contest.

"The argument could be made (party officials) did things illegally," Fleming said. "At the very least, they violated the trust of the party."

Fleming is the leader of the Maryland GOP's conservative faction, which is openly opposed by more moderate elements in the party led by Rep. Helen Delich Bentley.

Two weeks ago, Fleming confirmed his office is investigating another shift of party contributions from the Bush account to the Carroll County Central Committee's federal account. Mrs. Bentley has admitted she helped engineer the shift, largely to keep the money out of Fleming's hands.

However, Friday night, the state party's Executive Committee voted 18-7 to place Bentley and Richard P. Taylor, a Bentley ally, on a committee that will investigate the party's financial dealings during last fall's presidential contest.

Bentley said she was certain nothing illegal was done during the campaign and she expressed gratitude to the Executive Committee for the confidence it showed by placing her on the investigative committee.

Bentley's placement on the panel was denounced by James C. Wright, chairman of the Anne Arundel County Republican Central Committee and a leading Fleming ally.

Wright described the secret funds as a "laundering scheme" that hid what he insisted was a violation of federal election laws.

The decision to form a committee to look into the financial transactions followed a contentious two-hour meeting in which many party activists pleaded for more unity.

However, Fleming said, "But as state party chairman, I will not cover anything up. As the Executive Committee of the state party, we need to know what is going on."

THE SUNDAY CAPITAL

ANNAPOLIS, MARYLAND, MAY 14, 1989

GOP opens stormy spring convention

OCEAN CITY, Md. (AP) — Maryland's bitterly split Republican Party opened its annual spring convention with its chairman, conservative Daniel E. Fleming, hurtling charges that some party officials might have illegally altered contribution checks to keep existence of the money secret.

Fleming said his review of federal elections records indicated to him that as much as $69,000 in donations intended for George Bush's Maryland campaign ended up in a separate Baltimore fund, *The* (Baltimore) *Sun* reported yesterday.

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Md. GOP In Bitter Wrangle

Chairman Complains Of Altered Checks

The Washington Post

SUNDAY, MAY 14, 1978

Associated Press

OCEAN CITY, Md.—Maryland's bitterly split Republican Party opened its annual spring convention with its chairman, conservative Daniel E. Fleming, charging that some party officials may have illegally altered contribution checks to keep the existence of the money secret.

Fleming said his review of federal elections records indicated to him that as much as $69,000 in donations intended for George Bush's Maryland campaign ended up in a separate Baltimore fund, the Baltimore Sun reported Saturday.

About $50,000 of the money, according to Fleming, was channeled to Democratic organizations for literature promoting Democratic candidates for the U.S. Senate and House.

Fleming said that money, if spent on Republican campaigns, might have made the difference between winning and losing in some races, including the 1st District congressional contest.

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Two weeks ago, Fleming confirmed that his office is investigating another shift of party contributions from the Bush account to the Carroll County Central Committee's federal account. Bentley has acknowledged that she helped engineer the shift, largely to keep the money out of Fleming's hands.

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Bentley told The Sun that she was certain nothing illegal was done during the campaign and she expressed gratitude to the executive committee for the confidence it showed by placing her on the investigative committee.

Bentley's placement on the panel was denounced by James C. Wright, chairman of the Anne Arundel County Republican Central Committee and a leading Fleming ally.

Wright described the secret funds as a "laundering scheme" that hid what he insisted was a violation of federal election laws.

The decision to form a committee to look into the financial transactions followed a contentious two-hour meeting in which many party activists pleaded for more unity and warned of the dangers of a public fight over the financial issue.

However, Fleming said, "As state party chairman, I will not cover anything up. As the executive committee of the state party, we need to know what is going on."

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Maryland GOP will investigate fund shift

The Washington Times

MONDAY, MAY 15, 1989

By Steve Crane
THE WASHINGTON TIMES

OCEAN CITY, Md. — Three of the top officers of the Maryland Republican Party will head an investigation into the apparent diversion of about $20,000 in campaign funds and allegations that donations were tampered with last fall.

Heading up the investigation committee are state Party Chairman Daniel Fleming, National Committeewoman Rep. Helen D. Bentley and National Committeeman Richard Taylor.

The charges were the most serious leveled at managers of the state's Victory '88 fund and they sparked an hour of wrangling between factions of the party's executive committee at the start of the party's two-day spring convention over the weekend.

The squabbling continued into the full state central committee meeting Saturday where, between pleas for party unity, committee members clashed over resolutions welcoming anti-abortion candidates into the party and calling for a presidential pardon of Oliver North.

A move to oust Mr. Fleming was threatened but never acted upon at the Saturday session.

"There was a tremendous undercurrent in here," said Mr. Fleming after the Saturday meeting. "Both sides were poised like rattlesnakes. You could see the delineation.

"If anything, the tensions are higher now than they were," he said.

Mr. Fleming announced the Victory '88 investigation at Friday night's executive committee meeting, after reading a letter from a

see **GOP**, *page B2*

GOP

From page B1

$1,000 contributor who said his check to the state fund was altered to go to a Carroll County Central Committee campaign account.

Mr. Fleming also charged that the money was not all used for the fall campaign and that some of it was given to Democratic clubs in Baltimore to print fliers listing a slate of Democrats with President Bush at the top.

The money surfaced recently when the Carroll County Central Committee, believing there was only $8" in the account, went to close it and discovered almost $16,000.

"There's an investigation going on and we'll let the chips fall where they may," said Mr. Fleming.

"We didn't close the book on this. I want to do it [an investigation] immediately," he said. "If nothing wrong happened, fine."

Mr. Fleming did not name Mrs. Bentley nor Mr. Taylor to the committee when it was first announced.

The makeup of the committee was immediately challenged by executive committee members who said Mr. Taylor and Mrs. Bentley should be included on the investigating team. To do otherwise, they argued, would imply that Mr. Taylor and Mrs. Bentley were suspects of the investigation.

Supporters of Mr. Fleming argued against the inclusion of the two, saying they had been involved in the management of the account and should not be part of the investigation. But they were outvoted almost 2-1. Mr. Fleming said he would add more party members to the investigating team to balance the inclusion of Mr. Taylor and Mrs. Bentley.

Several party members said the handling of the Victory '88 fund was no different from the handling of the same account in 1984 when donations were shuffled to different county funds to help the presidential campaign and to keep Democrats' get-out-the-vote guard. A preliminary review of the books by the Republican National Committee reportedly has turned up no illegalities. And no prosecutors have been called in to investigate.

Both Mrs. Bentley and Mr. Taylor were confident the investigation would not turn up any improprieties.

But Mr. Fleming said he was concerned by the appearance of campaign money being usurped from the state party, and opponents of Mrs. Bentley's — some wearing "Stop the Power Grab" buttons — saw it as another attempt by party moderates to wrest control from Mr. Fleming.

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The Sunday Star
Sunday Edition Of The Star-Democrat

Fleming says GOP officials altered checks

OCEAN CITY (AP) — Maryland's bitterly split Republican Party opened its annual spring convention with its chairman, conservative Daniel E. Fleming, hurtling charges that some party officials may have illegally altered contribution checks to keep existence of the money secret.

Fleming said his review of federal elections records indicated to him that as much as $69,000 in donations intended for George Bush's Maryland campaign ended up in a separate Baltimore fund, The (Baltimore) Sun reported Saturday.

About $50,000 of the money, according to Fleming, was channeled to Democratic organizations for literature promoting Democratic candidates for the U.S. Senate and House.

Fleming said that money if spent on Republican campaigns might have made the difference between winning and losing in some races, including the 1st District congressional contest.

"The argument could be made (party officials) did things illegally," Fleming said. "At the very least, they violated the trust of the party."

Fleming is the leader of the Maryland GOP's conservative faction, which is openly opposed by more moderate elements in the party led by Rep. Helen Delich Bentley.

Two weeks ago, Fleming confirmed his office is investigating another shift of party contributions from the Bush account to the Carroll County Central Committee's federal account. Mrs. Bentley has admitted she helped engineer the shift, largely to keep the money out of Fleming's hands.

However, Friday night, the state party's Executive Committee voted 18-7 to place Mrs. Bentley and Richard P. Taylor, a Bentley ally, on a committee that will investigate the party's financial dealings during last fall's presidential contest.

Mrs. Bentley told The Sun that she was certain nothing illegal was done during the campaign and she expressed gratitude to the Executive Committee for the confidence it showed by placing her on the investigative committee.

Mrs. Bentley's placement on the panel was denounced by James C. Wright, chairman of the Anne Arundel County Republican Central Committee and a leading Fleming ally.

Wright described the secret funds as a "laundering scheme" that hid what he insisted was a violation of federal election laws.

The decision to form a committee to look into the financial transactions followed a contentious two-hour meeting in which many party activists pleaded for more unity and warned of the dangers of a public fight over the financial issue.

However, Fleming said, "But as state party chairman, I will not cover anything up. As the Executive Committee of the state party, we need to know what is going on."

Republican feuding over?

Opposing factions avoid confrontation at convention

OCEAN CITY (AP) — Maryland's Republican Party has ended its annual spring convention without a predicted floor fight over secret diversions of campaign funds that has touched off yet another bruising fight between the state GOP's two major factions.

"I think we held it all under control," U.S. Rep. Helen Delich Bentley, R-Baltimore County.

Mrs. Bentley is at the center of the latest battle between her traditional conservative-moderate faction and the party's new-right, fundamentalist Christian forces.

On Friday, the ruling executive committee engaged in a contentious debate over whether Mrs. Bentley and GOP National Committeeman Richard P. Taylor had acted improperly by secretly diverting at least $50,000 in campaign donations intended for the 1988 Republican presidential campaign to federal accounts in Carroll County and Baltimore.

While apparently legal, the diversion set off an uproar within the party because Mrs. Bentley admitted that one reason for the shift was to keep the funds out of the hands of her rival, state party Chairman Daniel E. Fleming, who leads the new-right forces.

Mrs. Bentley is at the center of the latest battle between her traditional conservative-moderate faction and the party's new-right, fundamentalist Christian forces.

Against Fleming's wishes, the executive committee voted Friday night to have Mrs. Bentley and Taylor assist Fleming's investigation of the diversion.

Outraged Fleming allies were expected to ignite the controversy again Saturday by asking the 173 delegates to the state convention to reverse the executive committee's action.

But the controversial issue never came up, apparently partly out of fear that would prompt Fleming opponents to revive a move for his ouster.

"There was a tremendous undercurrent in here," Fleming said after the tense meeting. "Both sides were poised like rattlesnakes."

But rather than air the party's dirty laundry in public again, the two factions seemed content to demonstrate their muscle on less divisive matters.

The only roll-call vote of the day, for instance, came in a dispute over whether the word "immediately" should be included in a state party resolution calling on President Bush to pardon Oliver L. North, convicted for his part in the Iran-contra scandal. The word "immediately" was dropped.

By voice vote, the Republicans also adopted an anti-union resolution calling for a "right-to-work" law in Maryland a stance Republicans from unionized areas of the state said they feared could backfire.

The convention then tabled a resolution urging the Supreme Court to overturn or significantly restrict its *Roe vs. Wade* abortion decision. Even some anti-abortion delegates saw the potential divisiveness of the resolution and urged its defeat.

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The Washington Post

WEDNESDAY, MAY 24, 1989

'Secret' Campaign Funds Divide Md. GOP—Again

By Robert Barnes
Washington Post Staff Writer

ANNAPOLIS—When Federal Trade Commission Chairman Daniel Oliver decided last fall to contribute to George Bush's presidential campaign, he called the Republican National Committee for advice. He was told to send a check to a fund-raising arm of the party called Victory 88.

Oliver complied, but he recently discovered that the payee line of his $1,000 check had been altered, that it wasn't cashed until days before the November election and that it somehow wound up in Carroll County, Md.

In a letter to a Maryland Republican official, Oliver posed these questions: "What I want to know is, what happened? And who did it? And why? . . . . [Who] tampered with my check? How was the money used? And why wasn't the check deposited until sometime in November? How many other checks were handled in this way?"

The recent discovery of what some Maryland Republican Party officials are calling secret campaign funds established during the presidential campaign has once again split the party, which has been more contentious than celebratory in the six months since Bush's surprise victory in the state.

In the latest spat, party Chairman Daniel E. Fleming has called for a full investigation of the way his party rival, Rep. Helen Delich Bentley, the party's senior elected official, and Republican National Committeeman Richard Taylor controlled two local funds that received about $100,000 during last fall's campaign. "The issue is too sensitive for anyone to say, 'You ought to keep quiet about this,' " said Fleming. "I won't cover things up."

See MARYLAND, B5, Col. 1

'Secret' Campaign Funds Widen Rift in Md. GOP

The Washington Post

WEDNESDAY, MAY 24, 1989

MARYLAND, From B1

Others in the party, however, believe the feud between Fleming, who heads the most conservative faction of the party, and Bentley, who is more moderate, is central to Fleming's decision to push for an investigation.

However, when Fleming, who was pointedly kept in the dark about the funds, asked the state executive committee to set up a panel to look into the matter, the members voted to include Bentley and Taylor.

"That's like putting John Poindexter and Robert McFarlane on the committee investigating Contragate," said Fleming.

Besides widening the rift in the state GOP ranks, the public attention the issue is receiving will likely arm those who have criticized the way national parties and presidential campaigns use local political organizations to override federal limits on presidential campaign spending.

For instance, the Bush campaign was no longer collecting contributions last fall when Oliver made his inquiry because of the limits that come with the public financing of presidential elections.

Both Democrats and Republicans instead expanded the use of so-called "soft money," contributions that often go to state and local parties that in turn spend money on behalf of the candidates.

Common Cause has sued the Federal Elections Commission to force more restrictions on such money.

The attention is also unwelcome at the Republican National Committee, which directly contributed $15,000 to one of the funds and which Fleming believes served as a funnel for contributions sent to national headquarters.

"We don't want to get caught up in that little struggle," said RNC Chief of Staff Mary Matalin, referring to the feud within the Maryland party.

Matalin headed the Victory 88 campaign and said the RNC had no role in diverting contributions to the funds controlled by Bentley.

Oliver was out of the country and could not be reached for comment, but his letter to a Maryland official indicates otherwise.

He wrote that he made out the check to "Victory 88" and sent it to RNC headquarters in Washington, but someone added the initials "CCRCCFA."

It thus ended up in the Carroll County Republican Central Committee's federal account, along with other checks, including one from former labor secretary Ann Dore McLaughlin, written to Victory 88.

Unknown to most members of the county central committee, county party Chairwoman Sharon Hornberger had agreed to Bentley's request to use the account to aid the Bush campaign.

The story became public when members of the county central committee discovered the practice and told reporters from local newspapers.

The existence of the account, plus a similar fund in Baltimore, was kept from Fleming and other officials of the Maryland Victory 88 committee.

The Carroll County fund eventually raised $37,000, while the Baltimore fund raised nearly $70,000, including $15,000 from the Republican National Committee.

In an ironic twist, $17,000 of the money in the Baltimore account was spent to pay some of the city's traditionally strong Democratic clubs to pass out campaign literature on Election Day.

At least part of the literature was "Democrats for Bush" cards, but not for the GOP candidates for Congress. The cards instead endorsed liberal Democratic Sen. Paul S. Sarbanes and Rep. Benjamin L. Cardin (D-Md.).

Taylor and others in the party assert there was nothing illegal or even unorthodox about the way the campaign money was handled.

They pointed out that it was reported to the FEC and they said the money was diverted to local accounts to hide it from Democrats and to protect Democratic contributors who didn't want to be identified as giving money to the state

Bentley, who did not return telephone calls, has also told party members she wanted to keep the money away from Fleming, whose resignation she had sought after Fleming mailed a controversial letter that linked convicted murderer Willie Horton Jr. and Democratic presidential candidate Michael S. Dukakis as a "profamily team."

FEC officials were reluctant to discuss whether any of the transactions violated federal law. The RNC's Matalin, who directed the Victory 88 program, was adamant that they hadn't.

"I just don't see anything that's illegal and just because he [Fleming] didn't know about it is not atypical," she said. There were similar funds in other states, Matalin added.

Fleming and state party officials are scheduled to meet with RNC officials today.

Maryland State Prosecutor Stephen Montanarelli has declined a request from a Carroll County Central Committee member to investigate the transactions.

Committee member Joseph Getty said his committee is waiting for further explanations from Hornberger before deciding whether to file an official complaint with the FEC.

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THE CAPITAL, Wednesday, May 24, 1989

FTC chair questions handling of GOP campaign donations

Federal Trade Commission Chairman Daniel Oliver wrote to a Maryland Republican official to question the manner in which his campaign contribution for the 1988 presidential election was handled, *The Washington Post* reported yesterday.

Oliver said when he decided last fall to contribute to George Bush's presidential campaign, he called the Republican National Committee for advice and was told to send a check to a fund-raising arm of the party called Victory 88.

Oliver said he recently discovered that the payee line of his $1,000 check had been altered, it wasn't cashed until days before the November election and it somehow wound up in Carroll County.

In a letter to a Maryland Republican official, Oliver posed these questions: "What I want to know is, what happened? And who did it? And why? . . . (Who) tampered with my check? How was the money used? And why wasn't the check deposited until sometime in November?"

Oliver's contribution was one of many state GOP officials have revealed were secretly diverted into a Carroll County account as part of an internal party struggle.

Party Chairman Daniel E. Fleming has called for a full investigation of the way his party rival, Rep. Helen D. Bentley, the party's senior elected official, and Republican National Committeeman Richard Taylor controlled two local funds that received about $100,000 during last fall's campaign.

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SHARON HORNBERGER
Probe in hands of state party

Carroll GOP officer filing a complaint

By JORDIE WOODWARD
Staff Writer

The treasurer of the Carroll County Republican Committee said Thursday he intends to mail a formal complaint to the Federal Election Commission concerning funds that were secretly deposited in the committee's federal account last year.

Louis Wiser, committee treasurer, took over the federal account this April from Gary Bauer after the committee discovered committee chairwoman Sharon Hornberger allowed outside funds to be placed in the federal account without the majority of the members' knowledge.

Wiser said he discovered several problems with the way the funds were handled and wants the FEC to investigate the matter. He said he has contacted FEC officials about the problems and was advised to submit a written complaint.

He intends to send the letter with supporting documentation soon, possibly this week.

Although he declined to go into detail about the possible election law violations, he said the altered checks are included in the complaint.

The checks where made out to Victory '88 and were altered with the initials CCRCCFA, the Carroll County Republican Central Committee Federal Account.

Bauer, who was treasurer when the checks were deposited, has said the initials were on the check when he received them.

Although Wiser could not go into any detail about the number of checks altered, at least one check writer has complained about the way his funds were used.

Daniel Oliver, chairman of the Federal Trade Commission, complained in a letter to a Maryland official that the payee line of his $1,000 check had been altered and that it wasn't cashed until days before the November election. "There's no question about altered checks," Wiser said.

The Republican Central Committee voted earlier this month to reject Hornberger's explanation of

Please see GOP, A4

GOP

From A1

why outside contributions were kept from five members.

The committee voted to submit written questions to her and asked to require her to answer those questions in writing.

Hornberger responded to the questions in a brief letter dated May 20.

In the letter, Hornberger said the investigation is now in the hands of the state party. The Maryland State Republican Party Executive Committee met in Ocean City on May 12 and discussed the matter. It referred the matter to a committee appointed by state party chairman Daniel Fleming, she wrote.

"It was specifically stated by Mr. Fleming as chairman that the only issue left to the local central committees involved, should they wish to pursue it, is what disclosure was made to individual member of the respective central committees," she wrote in her response.

Hornberger said she already has answered all questions about disclosure to committee members, both orally and in a written response dated April 27.

In that letter, Hornberger said she was urged by Rep. Helen Bentley, R-Md., not to discuss the matter with anyone who was not involved with either of the Bush or Victory '88 campaigns except on a "need-to-know" basis.

Wiser said he called a special meeting for May 25 to discuss Hornberger's latest response. However, that meeting was canceled Thursday.

Meanwhile, committee members are being tight-lipped about Hornberger's response to their questions — a sharp contrast to their former openness on the matter.

Members discussed the matter with the press before its May 4 meeting and opened that meeting to the press.

When asked for a copy of the questions submitted to Hornberger, members said it was up to Hornberger to release it. Hornberger refused to release the questions because she is sending them to the investigating committee set up by the state executive committee.

Sitting on that panel are Bentley and Richard Taylor, both of whom were involved with the transfer of the outside campaign funds. Taylor contacted Hornberger to set up the account initially and Bentley controlled the transfer and use of the funds.

However, Wiser said the questions submitted to Hornberger included many of the questions raised during the meeting, but in more detail.

During that meeting, members asked Hornberger to answer how the money was used and why the bulk of it was deposited in the account in November, just before and after the general election. Members also questioned Hornberger about how the funds were spent and whether those expenses were related to the campaign.

"The meeting raised many more questions because of the answers and lack of answers," Wiser said.

State GOP avoids fight over funds

Fleming camp stays quiet over diversion

By John W. Frece
Sun Staff Correspondent

OCEAN CITY — Maryland's ideologically divided Republicans restrained themselves yesterday, concluding their two-day spring convention without the damaging floor fight over secret diversions of campaign funds many feared could further splinter the state party.

"I think we held it all under control," said Representative Helen Delich Bentley, R-2nd, Maryland's GOP national committeewoman, who has personally been at the center of the latest fight between the party's new-right, fundamentalist Christian faction and the more traditional conservative and moderate wing that she represents.

Friday night, the ruling executive committee engaged in a contentious dispute over whether Mrs. Bentley and GOP National Committeeman Richard P. Taylor had acted improperly by secretly diverting at least $89,000 in campaign donations in- [redacted] 1988 Republican [redacted] o federal ac- [redacted] y and Balti- [redacted] help George [redacted]

[redacted] diversion was apparently [redacted] it has set off an uproar within [redacted] e party because Mrs. Bentley admitted that one reason for the shift was to keep the funds out of the hands of her rival, state party Chairman Daniel E. Fleming.

Against Mr. Fleming's wishes, the executive committee voted Friday night to have Mrs. Bentley and Mr. Taylor assist Mr. Fleming in in-

See GOP, 6B, Col. 3

ver funds

onstrate their muscle on less contentious matters.

The only roll-call vote of the day, for instance, came in a dispute over whether the word "immediately" should be included in a state party resolution calling on President [redacted] to pardon Oliver L. North. The word "immediately" was dropped.

By voice vote, the Republicans also adopted an anti-union resolution calling for a "right-to-work" law in Maryland — a stance Republicans from unionized areas of the state said they feared could backfire.

The convention then tabled a resolution urging the Supreme Court to overturn or significantly restrict its [redacted] vs. Wade abortion decision, [redacted] some anti-abortion delegates [redacted] the potential divisiveness of the [redacted] olution and urged its defeat.

90040811672

ver funds

GOP, from 1B

vestigating the shift of funds they had jointly engineered.

Outraged Fleming allies were expected to ignite the controversy again yesterday by asking the 173 delegates to the state convention to reverse the executive committee's action.

But the controversial issue never came up, apparently partly out of fear that that would prompt Fleming opponents to revive a move for his ouster.

"There was a tremendous undercurrent in here," Mr. Fleming said after the tense meeting. "Both sides were poised like rattlesnakes."

But rather than air the party's dirty laundry in public again, the two factions seemed content to demonstrate their muscle on less contentious matters.

The only roll-call vote of the day, for instance, came in a dispute over whether the word "immediately" should be included in a state party resolution calling on President Bush to pardon Oliver L. North. The word "immediately" was dropped.

By voice vote, the Republicans also adopted an anti-union resolution calling for a "right-to-work" law in Maryland — a stance Republicans from unionized areas of the state said they feared could backfire.

The convention then tabled a resolution urging the Supreme Court to overturn or significantly restrict its Roe vs. Wade abortion decision. Even some anti-abortion delegates saw the potential divisiveness of the resolution and urged its defeat.

George Bush for President

Dick —

A couple of checks —

Geo Bush

PAID FOR BY GEORGE BUSH FOR PRESIDENT

ANDREW MANOS
6905 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

OCT 10 1988

5231

10-15- 19 88 65-234/550

PAY TO THE ORDER OF Victory 88 $ 100 00

One Hundred — 00 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda Maryland 20817

FOR

Andrew Manos

1:055002346 42 6242 2 5231

PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816

2369

10/15 19 88 65-296/550

PAY TO THE ORDER OF Victory 88 $ 100 00

ONE HUNDRED — AND — NO DOLLARS

Citizens Bank Of Maryland
RIVERDALE, MD 20737

MEMO

1:055002969 280 2804 500 2369

2000408116375

1

Victory '88

October 21, 1988

Mr. Dick Taylor
Steptoe and Johnson
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Dick:

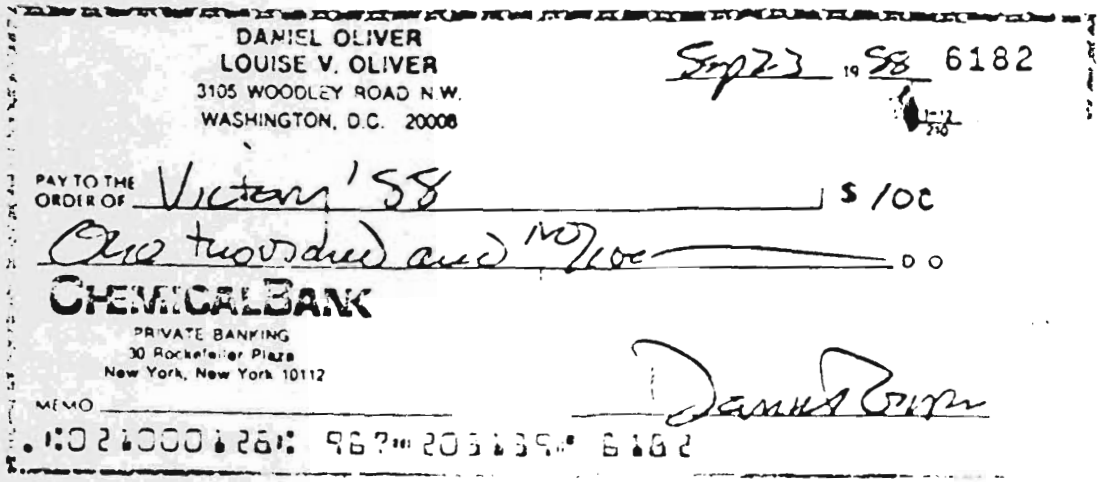
Enclosed is a $1,000 check for the District's Victory '88 federal account from Daniel Oliver. His address appears on his check, in the event you wish to send thanks.

Please call if you have any questions.

Sincerely,

Fred Bush

)0040116576



DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 58 6182

PAY TO THE ORDER OF Victory '58 $ 100

One hundred and no/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO

Daniel Oliver

⑆021000126⑆ 967 203 39 6182

9 0 0 4 0 3 1 1 6 7-7

VICTORY '88

Republican National Committee

Dick

Here a check for the Sec. of Labor — Be sure her thank you says thank you - Thx! —

[signature]

2765

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

10-17 19 88

15-52
540

PAY TO THE ORDER OF Victory '88 $ 1000.00

One Thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

Ann McLaughlin

⑆054000522⑆ 01⑈1024926⑈ 92765

9003403811678

101 PARK LANE
BALTIMORE, MD 21210

10/6/88 0190

PAY TO THE ORDER OF Victory 88 CCRCCFA $100.00

One Hundred and 00/100 DOLLARS

maryland national bank
PROFESSIONAL BANKING GROUP 222
BALTIMORE, MARYLAND

MEMO _____

⑆052000168⑆ 0190 ⑈000 ⑆37813⑈

ROBERT B. OR MARGARET K. BARNHILL
8607 WEYMOUTH COURT PH 301-377-6652
BALTIMORE, MD 21212

1811

10-1 1988

Pay to the Order of Victory 88 CCRCCFA $100.00

One hundred Dollars

South Carolina National Bank
Hilton Head Island, S.C. 29928

For _____

⑆053200191⑆ 18117⑈ 32 ⑆500571⑈

JOSEPH PAYNE
SUSAN FRICK PAYNE
204 WITHERSPOON ROAD
BALTIMORE, MARYLAND 21212

551

9/23 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $100.00

One hundred and 00 cents DOLLARS

PROFESSIONAL BANKING GROUP 222
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR Gift for President

Joseph and Susan Payne

⑆052000168⑆ 0551000 ⑆039254⑈

JOHN J. FOSTER JR
1510 DULANEY VALLEY ROAD
LUTHERVILLE, MD 21093

October 19 88 631

7-1/520 001

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $200.00

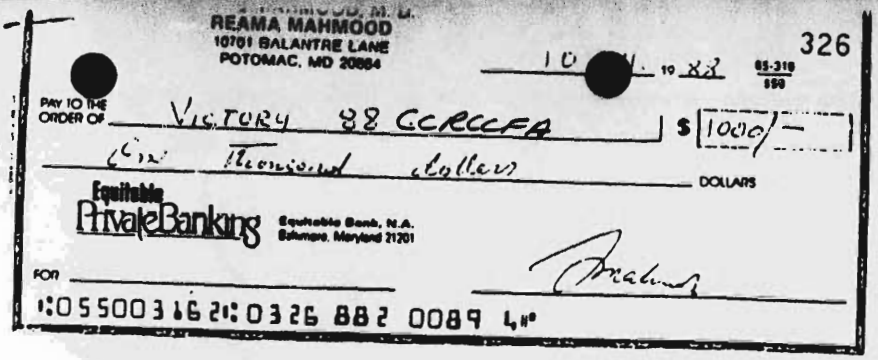
TWO HUNDRED AND 00/100 DOLLARS

UNION TRUST
COMPANY OF MARYLAND
BALTIMORE, MARYLAND 21203

MEMO CONTRIBUTION

⑆052000161⑆ ⑈301⑆ 57630⑈ 0631

0004031 1 6 7 9



REAMA MAHMOOD
10701 SALANTRE LANE
POTOMAC, MD 20854

326

10 [illegible], 19 88 — 65-319/890

PAY TO THE ORDER OF Victory 88 CCRCCFA — $ 1000/—

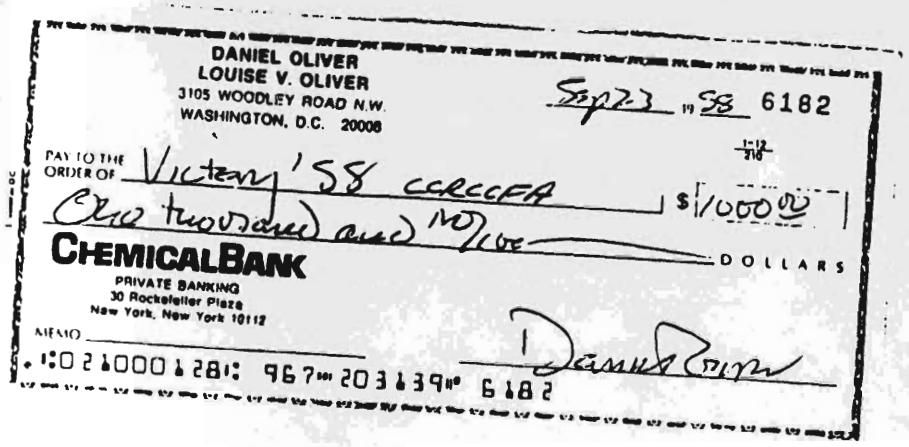
One Thousand Dollars — DOLLARS

Equitable PrivateBanking — Equitable Bank, N.A. Baltimore, Maryland 21201

FOR _____

[illegible]

⑆055003621⑆ 0326 882 0089 4⑈



DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 23 19 88 — 6182 — 1-12/510

PAY TO THE ORDER OF Victory '88 CCRCCFA — $ 1000.00

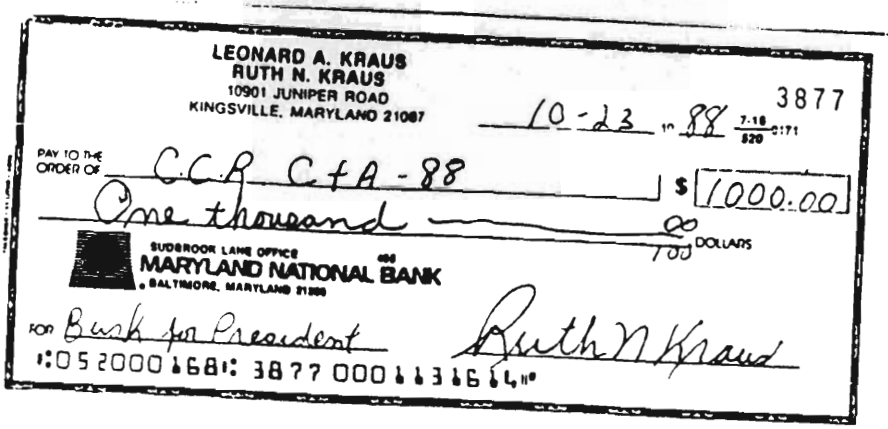
One thousand and NO/100 — DOLLARS

CHEMICAL BANK
PRIVATE BANKING
30 Rockefeller Plaza
New York, New York 10112

MEMO _____

Daniel Oliver

⑆021000128⑆ 967⑈ 203139⑈ 6182



LEONARD A. KRAUS
RUTH N. KRAUS
10901 JUNIPER ROAD
KINGSVILLE, MARYLAND 21087

3877

10-23 19 88 — 7-10/520 0171

PAY TO THE ORDER OF C.C.R. C.F.A - 88 — $ 1000.00

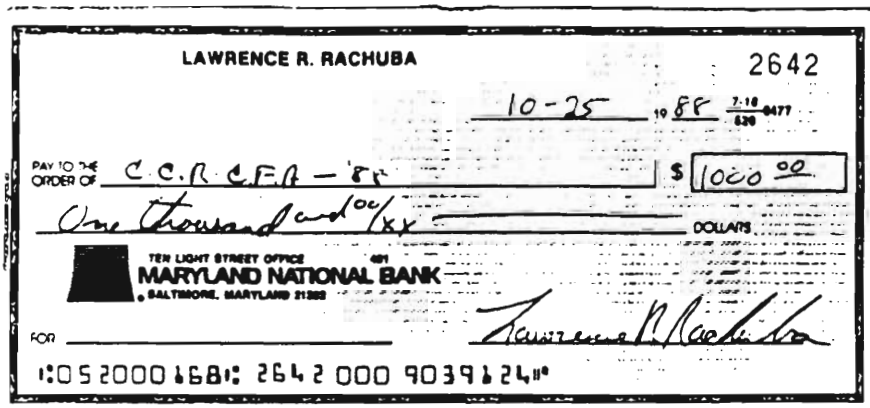
One thousand — 00/100 DOLLARS

SUDBROOK LANE OFFICE 450
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21208

FOR Bush for President

Ruth N Kraus

⑆052000168⑆ 3877 000 1 3 1 6 6 4⑈



LAWRENCE R. RACHUBA

2642

10-25 19 88 — 7-10/520 0477

PAY TO THE ORDER OF C.C.R. C.F.A - '88 — $ 1000 00

One Thousand and 00/XX — DOLLARS

TEN LIGHT STREET OFFICE 601
MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND 21202

FOR _____

Lawrence R Rachuba

⑆052000168⑆ 2642 000 9039 1 24⑈

>0040311630

9 3 3 4 0 3 1 1 6 8 1

DEPOSIT TICKET

CARROLL COUNTY REPUBLICAN CENTRAL
COMMITTEE - FEDERAL ACCOUNT
P.O. BOX 2109
WESTMINSTER, MD 21157

DATE 11-2 19 88

CASH		
CHECKS	7-61	1000 00
TOTAL FROM OTHER SIDE		
TOTAL	1060	00

Union National Bank
WESTMINSTER MARYLAND 21157

⑈001858⑈ ⑆055000615⑆ ⑈1070106 2⑈

GORDON L. SMITH
BARBARA SMITH
13711 EAST DEVONFIELD DRIVE
BALDWIN, MARYLAND 21013

3848

October 31 19 88

PAY TO THE ORDER OF Victory '88 $ 200.00

Two Hundred and 00/100 DOLLARS

Equitable Equitable Bank, N.A. Baltimore, Maryland

FOR (Contribution)

⑆052000896⑆ 3848 798 0088 70⑈

BENTLY RE-ELECT COMMITTEE INC. 88
P O BOX 10819
TOWSON MD 21285

1078

10-28 19 88

PAY TO THE ORDER OF CCRCFA-88 $ 1000 00

One Thousand 00/100 DOLLARS

MERCANTILE-SAFE DEPOSIT & TRUST COMPANY
LUTHERVILLE TIMONIUM, MARYLAND 21093

For Check from Franklin Pardue Deposit in Treasurer Margaret E. Mullen

⑈0000 1078⑈ ⑆052000618⑆ ⑈6257291⑈

HENRY A. ROSENBERG, JR.

SIGNET BANK

2759

Oct. 24 19 88

PAY TO THE ORDER OF Victory '88 $ 1,000.00

One thousand and 00/100 DOLLARS

FOR

⑈002759⑈ ⑆052000186⑆ ⑈306-07956⑈

2004031116382

JOHN B. BURCHAM, JR.
8821 NASHVILLE ROAD
LANHAM, MD 20706

750

October 24, 1988

PAY TO THE ORDER OF CCRCFA-88 $ 1000.00

One thousand and no/100 DOLLARS

CHEVY CHASE®
A FEDERAL SAVINGS BANK
CHEVY CHASE, MD 20815

FOR

John B. Burcham, Jr.

:255071981: 163306846 0750

W. DALE HESS
MARIE R. HESS
FALLSTON MD 21047

6200

10/22 1988

PAY TO THE ORDER OF C.C.R.C. FA-88 $ 1,000.00

One Thousand DOLLARS

THE FOREST HILL STATE BANK
FOREST HILL, MARYLAND

FOR

W. Dale Hess

⑈0006200⑈ ⑆055002286⑆ 0000264650⑈

WILLIAM R. ROTHE
GAY FREDERICK ROTHE
4000 TUNLAW ROAD N.W. NO 307
WASHINGTON D.C. 20007

2825

10/23/88

PAY TO THE ORDER OF Victory '88 $ 200.00

two hundred and no/100 DOLLARS

MARYLAND NATIONAL BANK
BALTIMORE, MARYLAND

FOR

⑆052000168⑆ 2825 00 16240864⑈

JAYNE H. PLANK

153

10/ 88

PAY TO THE ORDER OF FS Victory 88 $ 500.00

Five hundred and 00/100 DOLLARS

CAMP SPRINGS TRUST
TRUSTMARK

1000 Pinehurst Dr
Riverdale MD 20737

Jayne H. Plank

⑆055002969⑆ 124 0000-0153

Riverdale MD 20737

DRIVE POLITICAL FUND
25 LOUISIANA AVE., N.W.
WASHINGTON, D.C. 20001

10154

October 31, 19 88

PAY TO THE ORDER OF C.C.R.C.F.A. - '88

$ 5,000.00

Five Thousand Dollars and No Cents ---------- DOLLARS

CREDIT
Crestar Bank N.A.
Washington, DC

FOR Contribution - Federal Account

William D. Quarto

William J. McCarthy

#010154# :054000522: 025101243#

TUDOR MANOR PARTNERSHIP
25 ELLENDALE ST.
BEL AIR, MD 21014

525

11-7 19 88

PAY TO THE ORDER OF C.C.R.C.F.A. -'88

$ 2,000.00

THE S[illegible] DOLLARS

Bank of Mary[illegible]

FOR Bush Fund Raiser

Lou A. Sandro

#000525# :055002299: 010087D#

SIGNET BANK

7578

11/2 19 88

RONALD G. ALESSI, SR.
KATHLEEN S. ALESSI
31 OAKWAY ROAD
TIMONIUM, MD 21093
252-2211

PAY TO THE ORDER OF CCRCFA-88

$ 500.00

FIVE HUNDRED DOLLARS 00 CTS DOLLARS

FOR

Ronald G. Alessi

#007578# :052000016:# 343-8207957#

PETER ZOURDOS
5101 RIVER ROAD
BETHESDA, MARYLAND 20816

2309

10/15 19 88

PAY TO THE ORDER OF Victory 88 CCRCCFA $ 100 00

ONE HUNDRED AND NO DOLLARS

Citizens Bank of Maryland
RIVERDALE, MD. 20737

MEMO

⑆055002969⑆ 280 2804⑈500⑈2369

ANN McLAUGHLIN
2918 GARFIELD STREET, N.W.
WASHINGTON, D.C. 20008

2765

10-17 1988

15-52
540

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One thousand and 00/100 DOLLARS

CRESTAR
Crestar Bank N.A.
Washington, DC

FOR

Ann McLaughlin

⑆054000522⑆ 01⑈6024926⑈ 92765

PARVEZ SHAH, M.D. 6-88
BIRJEES SHAH
4405 DUSTIN RD.
BURTONSVILLE, MD 20866

1272

Oct 12th 1988

Pay to the Order of Victory 88 CCRCCFA $ 1,000.00

One thousand 00/100 Dollars

THE CITIZENS NATIONAL BANK
BURTONSVILLE BRANCH
BURTONSVILLE, MARYLAND 20866

For MARYLAND

⑆055000770⑆ 1272 000294066 6⑈

SHAUKAT A. ASHAI
ASMAT R. ASHAI
TEL. 301-730-5943
11380 HEATHERTOE LANE
COLUMBIA, MARYLAND 21044

0735

10-11 19 88

7-18
520 1270

PAY TO THE ORDER OF VICTORY 88 CCRCCFA $ 1000 00

One thousand and no/100 DOLLARS

COLUMBIA OFFICE
MARYLAND NATIONAL BANK
COLUMBIA, MARYLAND 21044

FOR Election contribution Bank

⑆052000168⑆ 0735 00 7894 7108⑈

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2 . . 40 . . 1 1 6 8 4

817

JUNE K. ABEL
401 SCOTT PL.
SILVER SPRING, MD 20904

September 24 19 85 65-223/550 01

PAY TO THE ORDER OF Victory 85 CCRCCFA $ 100.00

One hundred DOLLARS

Montgomery National Bank

FOR June K. Abel

⑈000817⑈ ⑆055002236⑆ ⑈01⑈007335⑈06⑈

JAMES P. GOLDSMITH
SALLY S. GOLDSMITH
1512 BOLTON ST.
BALTIMORE, MARYLAND 21217

1933

10-7 19 85 65-40/821 010

PAY TO THE ORDER OF Victory 85 CCRCCFA $ 150.00

one hundred fifty DOLLARS

First National Bank of Maryland
SALISBURY, MARYLAND ACCOUNTING CENTER

FOR

James P. Goldsmith

⑆052100408⑆ 059⑈0270 8⑈ 1933

AMERICAN EXPRESS MONEY ORDER

Pentagon Federal Credit Union 04-388,304,036
Box 1432 — Arlington, Virginia 22313

PAY THE SUM OF NOT GOOD OVER $1,000.

THE SUM 250 DOLS 00 CENTS

DATE Oct 27 19 85

TO THE ORDER OF CCRCFA 85

Lon Voit

SENDER'S NAME AND ADDRESS Jean M Shannon 5811 Hubbard Ln Temple Hills Md 20748 & JOHN W.

BEFORE CASHING READ NOTICE ON BACK

Issued by American Express Travel Related Services Company, Inc. Englewood, Colorado

Payable at Inter-West Bank of Grand Junction Grand Junction, Colorado

⑆102100400⑆04 ⑈388304036⑆⑈

ANDREW MANOS
5905 MILLWOOD ROAD
BETHESDA, MARYLAND 20817

OCT 10 1988

5231

10-15 19 85 65-234/550

PAY TO THE ORDER OF Victory 85 CCRCCFA $ 100.00

One hundred 00/100 DOLLARS

SOVRAN BANK
Sovran Bank / Maryland Bethesda, Maryland 20817

FOR

Andrew Manos

⑆055002346⑆ 42 6242 2⑈ 5231

P0040811635

JANE G. IRWIN

2244

Oct. 18 19 88

PAY TO THE ORDER OF Free State Victory '88 Fund-------- $ 2500. 00

Two thousand five hundred and no/100 DOLLARS

NEW CANAAN BANK
NEW CANAAN, CONNECTICUT

Contribution

Jane G. Irwin

:021099935: 25 1678 7# 2244

JOHN N. IRWIN II

1522

10/19/ 1988

PAY TO THE ORDER OF Free State Victory'88 Fund-------- $ 2,500.00

Two thousand five hundred and no/100---------DOLLARS

USTrust UNITED STATES TRUST CO OF NEW YORK 114 W. 47th St. NEW YORK, N.Y. 10036

John N. Irwin II

:021001316: 60 7439 7# 1522

2004031116386

FOR 10/01/88 TO 11/28/88 REPUBLICAN NATIONAL COMMITTEE - [illegible] P...
FOR 01/01 11/28/88 ITEMIZED DISBURSEMENT
SCHEDULE B LINE 27A

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	AMOUNT
HON. EDWARD C. DuPONT C/O NH REP. ST. CMTE. 134 NORTH MAIN STREET CONCORD, NH 03301	VOID #10938 - 10-21-88	10/26/88	[illegible]
ERIE CTY REP PTY STATLER TOWERS, ROOM 1608 BUFFALO, NY 14202	TRANSFER OUT	11/04/88	[illegible]
CMTE TO ELECT R. ESPOSITO MRS ESPOSITO, TREAS. 86 LORI LA ROCHESTER, NY 14624	CONTRIB.	10/31/88	[illegible]
CMTE TO ELECT J FLANAGAN CORRIE A SCHOPP, TREAS. 53 GRANT ST. EAST NORTHPORT, NY 11731	CONTRIB.	10/31/88	1,000.00
FREE STATE VICTORY'88 FUND 2516 NORTH CHARLES ST. BALTIMORE, MD 21218	CONTRIBUTION	10/26/88	15,000.00
CMTE REELECT R J GAFFNEY CO REHM, TREAS. 106 SOUTH ST. PORT JEFFERSON, NY 11777	CONTRIB.	10/31/88	1,000.00
THE JUDD GREG COMM. P.O. BOX 3471 CONCORD NH 03061	CONTRIBUTION	10/26/88	5,000.00
HON. RUTH GRIFFIN C/O NH REP ST. COMTE. 134 NORTH MAIN ST. CONCORD, NH 03301	CONTRIBUTION	10/21/88	2,000.00
	PAGE TOTAL		30,000.00

Federal Account Treasurer
Carroll County Republican
Central Committee
2810 Gillis Street
Mt. Airy, Maryland 21771
May 25, 1989

Office of General Counsel
Federal Elections Commission
999 E Street NW
Washington, D.C. 20463

Dear Sirs:

This letter is being sent in response to a telephone conversation of May 24, 1989, that Janet Hess of your office had with me regarding the Carroll County Republican Central Committee Federal Account (ID #C000232603).

The Carroll County Republican Central Committee (CCRCC) would like to request a review of the activities in its Federal Account. During the course of the 1988 Presidential campaign, funds from Victory '88, the Maryland Republican Party Federal Account, were diverted into the Federal Account of the CCRCC. This diversion of campaign funds was concealed from five of the seven members of the CCRCC. The members who had no knowledge of these activities are Donald Taylor, Vice-Chairman; Louis E. Wiser, Jr., Treasurer; Frank D. Coleman, Secretary; Joseph M. Getty; and Edwin E. Rash.

The diversion of funds consisted of deposits that were made between October 23, 1988 and November 14, 1988. The Federal Account treasurer's records show that between $19,300 and $20,700 were diverted to the CCRCC Federal Account. The deposits and disbursements of these funds were made under the direction of CCRCC Chairwoman Sharon W. Hornberger, with the knowledge of the CCRCC Federal Account Treasurer Gary W. Bauer and CCRCC member Frank Rammes.

At a meeting of April 18, the CCRCC passed a motion for the immediate appointment of CCRCC Treasurer Louis E. Wiser, Jr., as Federal Account Treasurer and the transfer of all accounts, ledgers, books, invoices, receipt and disbursement records, and other papers relating to activity in this account from Mr. Bauer to Mr. Wiser. A review of these materials and discussion of these issues at a meeting of May 4 raised additional questions. The CCRCC passed a motion at the May 4 meeting to request from Chairwoman Hornberger a written response to these questions. In a letter of May 20, Chairwoman Hornberger refused to respond and denied access to additional information that could clarify the activities that took place in this account.

Based on the treasurer's records available for review, irregularities in the administration of this account suggest possible violations in the following areas:

1) The treasurer's records do not provide proper identification for a majority of the contributors from outside of Carroll County to the CCRCC Federal Account;

2004031538

2) The treasurer's records do not contain documentation that "best efforts" had been undertaken to obtain identification information;

3) Discrepancies in the treasurer's records and missing invoices call into question whether the treasurer's records met federal regulations;

4) Photocopies of the checks that were diverted to the CCRCC Federal Account show that some of the checks were not deposited within the 10-day time limit;

5) Photocopies of the checks show that 10 checks of $1000 each were received while the bank deposit slips show that only 9 were deposited;

6) Photocopies of the checks show that some of the checks deposited were not made out to the CCRCC Federal Account. Instead these checks were made out to "Victory '88," (the Maryland Republican Party Federal Account) and "FS Victory '88" (Free State Victory '88) and their deposit into the CCRCC Federal Account may be in violation of FEC regulations;

7) If these were illegal deposits, it may require the return of these funds to the contributors (17 of the 26 checks deposited in the diversion of campaign funds were made out to "Victory '88" and "FS Victory '88" totaling $7950), but this money has been transferred out of this account to other Federal Accounts in Maryland;

8) Photocopies of the checks show that some of the checks that were made out to "Victory '88" were altered on the face of the check by a written addition of the initials "CCRCCFA" on the payee line. The Maryland Republican Party has received correspondence from one of the contributors, Mr. Daniel Oliver, that states that this alteration of his $1000 check was unauthorized.

2004031156389

It is the desire of this committee to rectify any outstanding problems with the administration of the CCRCC Federal Account. Enclosed is documentation that provides some of the details of these activities. Please let me know if there are additional materials necessary for you to complete your review.

Sincerely,

Louis E. Wiser, Jr.
Federal Account Treasurer

Enclosures

REPUBLICAN STATE CENTRAL COMMITTEE
CARROLL COUNTY
P.O. BOX 2108
WESTMINSTER, MARYLAND 21157

FREDERICK, MD 21701
PM
JUN

Yosemite

Mr.Ben Ginsberg
310 1st. Street S.E.
Washington, D.C. 20003

9 0 4 0 8 1 1 6 9 0

Daniel Oliver
3105 Woodley Road, N.W.
Washington, D.C. 20008

May 12, 1989

[redacted]

Last fall I called the Republican National Committee in Washington to find out how to make a contribution to the George Bush campaign. I was told to send a check payable to "Victory '88" to the RNC Headquarters on First Street. On September 26th I sent in a check for $1,000.

Weeks passed without any acknowledgement from the RNC that my check had been received. Now there have been reports in the papers of possible irregularities concerning funds that were contributed to the RNC Victory '88 fund. My check appears to have been altered -- the letters "CCRCCFA" having been added on the payee line. The check was not cashed until about November 3rd. (I have enclosed a copy of the front and back of the check: but as always, the back, including the date it was deposited, is a bit hard to read.) And the funds were deposited in a Maryland bank.

What I want to know is, what happened? And who did it? And why? What is "CCRCCFA?" Is "Victory '88" the same organization as "Victory '88 CCRCCFA." And if not, who tampered with my check? How was the money used? And why wasn't the check deposited until some time in November? How many other checks were handled in this way? How much money was left over after the campaign?

I know you will want to clear up these matter, and do so sufficiently publicly to reassure people who might otherwise be discouraged from making contributions in the future.

Sincerely,

Daniel Oliver

2004081621

DANIEL OLIVER
LOUISE V. OLIVER
3105 WOODLEY ROAD N.W.
WASHINGTON, D.C. 20008

Sept 21 '88 6182

PAY TO THE ORDER OF Victory '88 CCRCCFA $ 1000.00

One thousand and NO/100 DOLLARS

CHEMICAL BANK
PRIVATE BANKING
20 Rockefeller Plaza
New York, New York 10112

MEMO 707

Daniel Oliver

⑆021000128⑆ 967-203139⑈ 6182 ⑈0000100000⑈

200403116992

MD 02
FNB OF MD
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107-0101-2

NO 88 09
CHEMICAL BANK
20 WALL ST.
N.Y.C. N.Y.

Carroll County

1988 & 1989

0040011593

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 MAR 13 AM 9:22

Carroll County Republican
Central Committee
Federal Account C00232603
924 Century Street
Hampstead, Maryland 21074

March 7,1989

Mr. Todd S. Hageman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Account No. C00232603

Dear Mr. Hageman:

Pursuant to our conversation of March 7, 1989 at 11:00 A.M., I am requesting that our report filing status be changed from monthly to quarterly during the non-election time period.

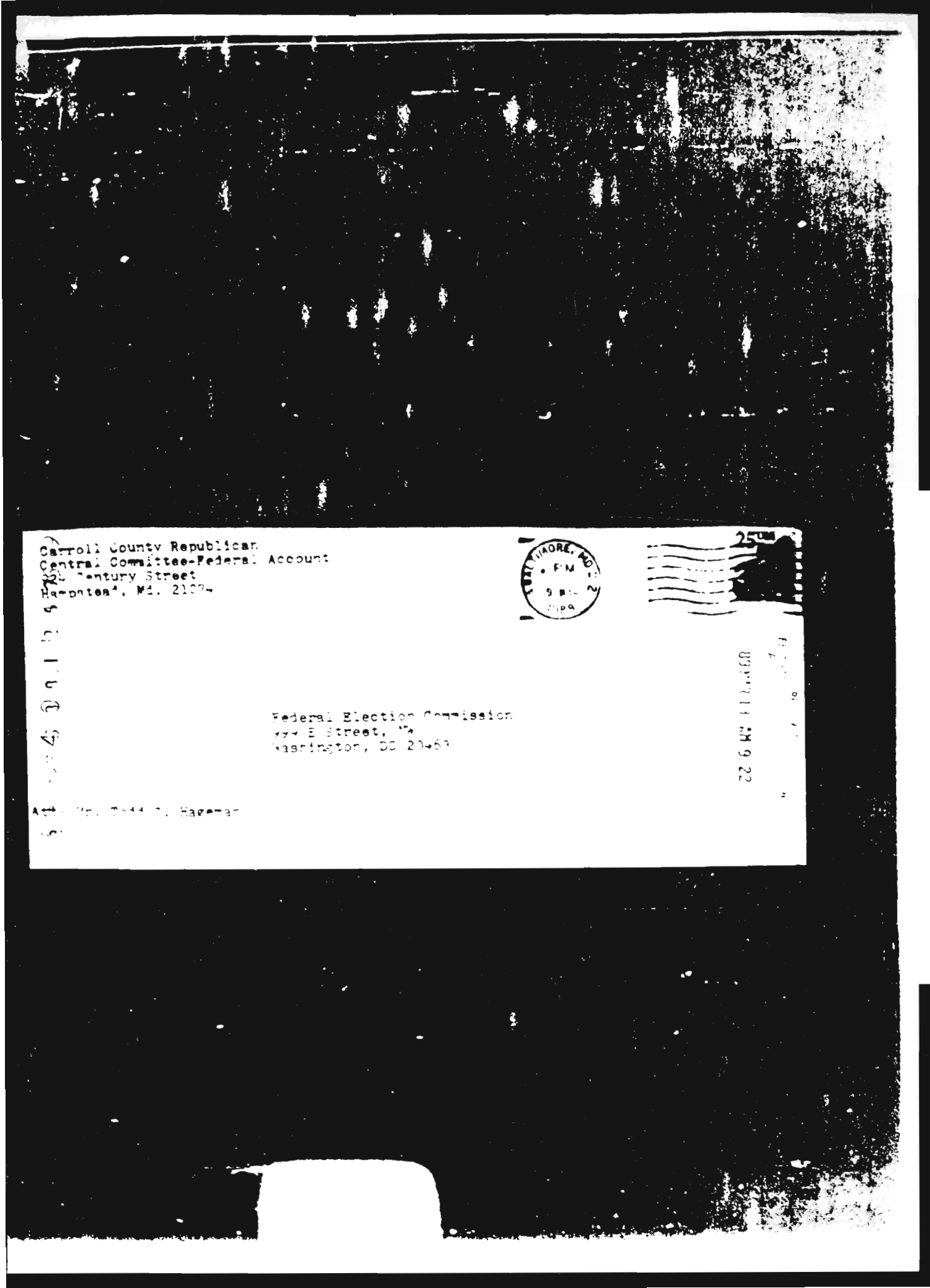
Thank you for your advice and assistance in regards to this matter.

I look forward to your conformation letter.

Sincerely,

Gary W. Bauer
Treasurer
239-8309

3 2 0 3 4 8 0 8 1 2 5 6 9 4



Carroll County Republican
Central Committee-Federal Account
[illegible] Century Street
Hampstead, Md. 2107-

Federal Election Commission
[illegible] E Street, [illegible]
Washington, DC 20463

Attn: Mr. Todd [illegible] Hageman

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION
WASHINGTON DC

89 FEB 21 AM 11:53

NAME OF COMMITTEE (In full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) ☐ Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, MD. 21074

2 FEC IDENTIFICATION NUMBER:
C00232603

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

☒ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

Covering Period 1/1/89 through 1/31/89

		COLUMN A This Period	COLUMN B Calender Year-to-Date
6a	Cash on Hand January 1, 19 89		$ 16832.68
6b	Cash on Hand at Beginning of Reporting Period	$ 16832.68	
6c	Total Receipts (from Line 18)	$ 190.23	$ 190.23
6d	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 17022.91	$ 17022.91
7	Total Disbursements (from Line 28)	$ 3532.67	$ 3532.67
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 13490.24	$ 13490.24
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Mary Warren Bauer

Signature of Treasurer
Mary Warren Bauer

Date
2/15/89

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full): Carroll County Republican Central Committee-Federal Account

Report Covering the Period: From 1/1/89 To 1/31/89

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)			11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))			11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13 ALL LOANS RECEIVED			13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	190.23		15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)			17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	190.23		18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	3400.00		19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24 LOAN REPAYMENTS MADE			24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27 OTHER DISBURSEMENTS	132.67		27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	3532.67		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	0		29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0		30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	0		31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	3400.00		32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	190.23		33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	3209.77		34

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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)

Carroll County Republican Central Committee-Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Leslie Jacoby 1740 Weston Ave. Parkville, MD. 21234	computer rental Disbursement for ☐ Primary ☐ General ☐ Other (specify)	1/27/89	$ 2200.00
B. Full Name, Mailing Address and ZIP Code Marge Newman 4225 Thorncliff Rd. Balto., MD. 21236	computer rental Disbursement for ☐ Primary ☐ General ☐ Other (specify)	1/27/89	$ 1200.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) $ 3400.00

CERTIFIED

P-525 236 556

MAIL

Public Records Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RETURN RECEIPT
REQUESTED

SEP 21 AM 8:53

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION

89 MAR 20 AM 11:35

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) — Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, Maryland 21074

2 FEC IDENTIFICATION NUMBER
C00232603

3 — This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a.) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☒ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 2/1/89 through 2/28/89		
6	(a) Cash on Hand January 1, 19 89		$ 16832.68
	(b) Cash on Hand at Beginning of Reporting Period	$ 13490.24	
	(c) Total Receipts (from Line 18)	$ 0	$ 190.23
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 13490.24	$ 17022.91
7	Total Disbursements (from Line 28)	$ 1233+.69	$ 15867.36
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1155.55	$ 1155.55
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Mary Warren Bauer

Signature of Treasurer — Date 3/1/89

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full) Carroll County Republican Central Committee-Federal Account	Report Covering the Period From 2/1/89 To 2/28/89		
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11 CONTRIBUTIONS (other than loans) FROM			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)			11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))			11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13 ALL LOANS RECEIVED			13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		190.23	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)			17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		190.23	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	1432.89	4832.89	19
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	10889.00	10889.00	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24 LOAN REPAYMENTS MADE			24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27 OTHER DISBURSEMENTS	12.80	145.47	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	12334.69	15867.36	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	0	0	29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	0	0	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	1432.89	4832.89	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	190.23	33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	1432.89	4642.66	34

HEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 19

...y 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 ...urposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Full Name, Mailing Address and ZIP Code International Limosine Service P.O. Box 7410 Balto., MD. 21227	travel Disbursement for ___ Primary [ ] General [ ] Other (specify)	2/7/89	$1000.00
B Full Name, Mailing Address and ZIP Code Leslie Jacoby [illegible] Weston Ave. Parkville, MD. 21234	computer rental Disbursement for ___ Primary [ ] General [ ] Other (specify)	2/7/89	$ 432.89
C Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of this page (optional)

TOTAL this column (optional) $1432.89

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 20

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)

Carroll County Republican Central Committee-Federal Account C00232603

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A	Carroll County Republican Central Committee P.O. Box 2109 Westminster, MD. 21157	transfer Disbursement for ☐ Primary ☐ General ☐ Other (specify)	2/9/89	$ 889.00
B	Baltimore County Victory Fund 4225 Thorncliff Rd. Balto., MD. 21236	transfer Disbursement for ☐ Primary ☐ General ☐ Other (specify)	2/9/89	$5000.00
C	Freestate Victory 6505 Rusk Ave. Balto., MD. 21215	transfer Disbursement for ☐ Primary ☐ General ☐ Other (specify)	2/22/89	$5000.00
D	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL

TOTAL $ 10,889.00

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

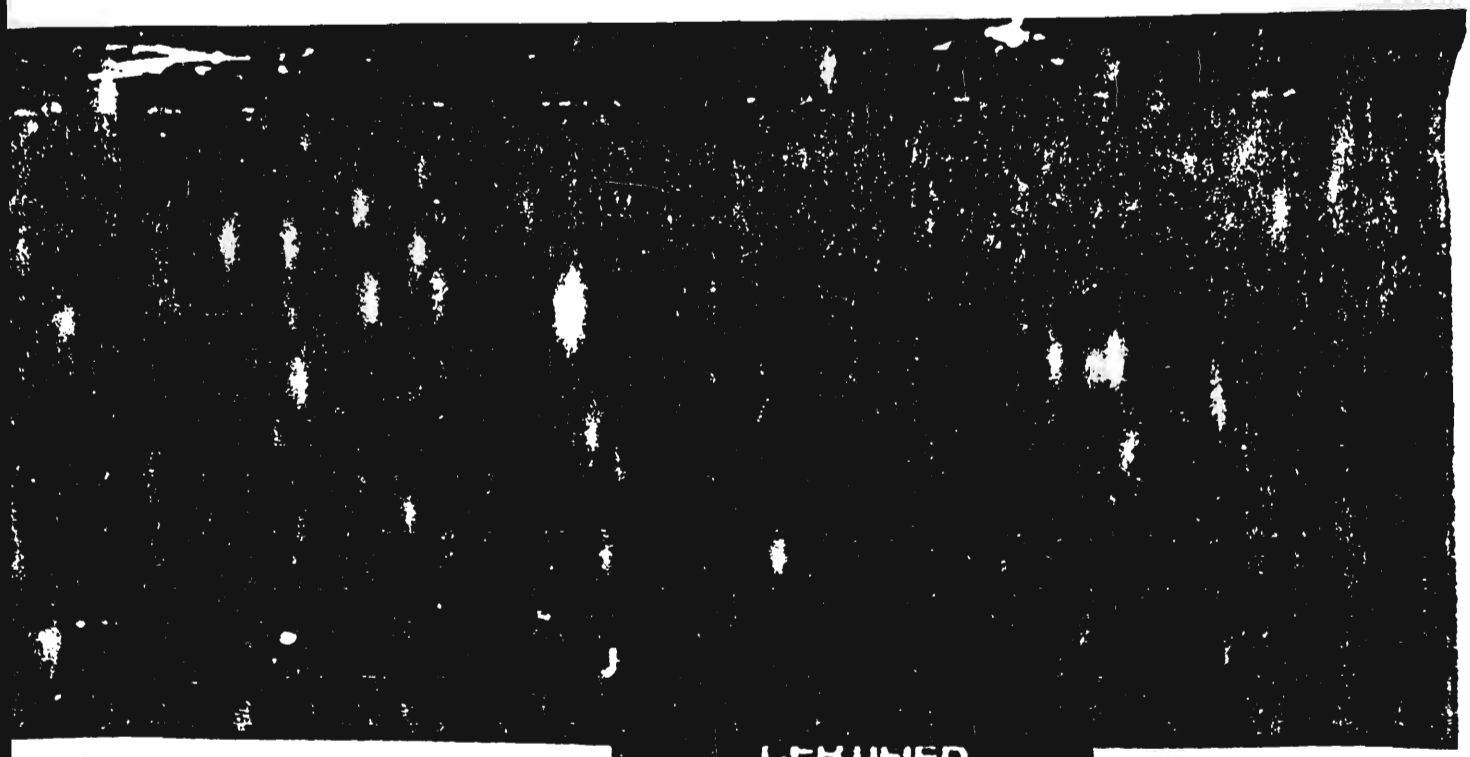
FOR LINE NUMBER 20

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A	Carroll County Republican Central Committee P.O. Box 2108 Westminster, MD. 21157	transfer Disbursement for: Primary, General, Other (specify)	2/9/89	$ 999.00
B	Baltimore County Victory Fund 4225 Thornclift Rd. Balto., MD. 21236	transfer Disbursement for: Primary, General, Other (specify)	2/9/89	$5000.00
C	Freestate Victory 5505 Rusk Ave. Balto., MD. 21215	transfer Disbursement for: Primary, General, Other (specify)	2/22/89	$5000.00
D	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period



CERTIFIED

P-525 237 049

MAIL

rroll County Republican
ntral Committee-Federal Account
. Century Street
rroll, MD. 21[illegible]

Federal Election Commission
999 E Street, NW
Washington, DC 20463

RETURN RECEIPT
REQUESTED



REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 OCT 26 PM 12:40

USE FEC MAILING LABEL OR TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
Federal-Account
Carroll County Republican Central Committee

ADDRESS (number and street) — Check if different than previously reported
P.O. Box 2108

2 FEC IDENTIFICATION NUMBER
C00232603

CITY STATE and ZIP CODE
Westminster, Maryland 21157

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☒ Twelfth day report preceding General (Type of Election) election on 11/8/88 in the State of MD

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5 Covering Period 1/1/88 through 10/27/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)	Cash on hand January 1, 19 88		$ 0
(b)	Cash on hand at Beginning of Reporting Period	$ 0	
(c)	Total Receipts (from Line 18)	$ 15320.11	$ 15320.11
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B	$ 15320.11	$ 15320.11
7	Total Disbursements (from Line 28)	$ 10671.23	$ 10671.23
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 4648.88	$ 4648.88
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and or Schedule D)	$ 400.00	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Jerry Warren Bauer

Signature of Treasurer

Date
10/24/88

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

FEC FORM 3X
(revised 4/87)

CHEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 1

FOR LINE NUMBER 12

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)
Carroll County Republican Central Committee-Federal Account

	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
A	Westminster Republican Women's Club 1801 Bachmans Valley Rd. Westminster, MD. 21157		9/12/88	$ 200.00
B	South Carroll Republican Club 2810 Gillis Rd. Mt. Airy, MD. 21771		9/23/88	$ 200.00
C	Tri-District Republican Club P.O. Box 471 Finksburg, MD. 21048		9/29/88	$1055.00
D	Carroll County Republican Club c/o Leister's Church Rd. Westminster, MD. 21157		9/29/88	$1400.00
E	Taneytown Republican Women's Club [illegible] Sullivan Rd. Westminster, MD. 21157		10/22/88	$ 50.00
F				
G				

Receipt For: Primary / General / Other (specify)

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

$3005.00

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 1 OF 1

FOR LINE NUMBER: 13

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)

Carroll County Republican Central Committee-Federal Account

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
G. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	Mills Communications Occupation: owner	8/17/88	400.00
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify) Aggregate Year-to-Date > $			
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			400.00

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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)
Carroll County Republican Central Committee-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert Frey c/o Larry Haines 140 Village Shopping Center Westminster, MD. 21157	headquarter lease Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/29/88	$ 500.00
B. Full Name, Mailing Address and ZIP Code Swain Supply, Inc. c/o Donald Taylor P.O. Box 513 Westminster, MD. 21157	Purpose of Disbursement supplies for dinner (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/31/88	Amount of Each Disbursement This Period $ 240.40
C. Full Name, Mailing Address and ZIP Code C & P Telephone P.O. Box 857 Baltimore, MD. 12165	Purpose of Disbursement Phone for HQ Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 305.49
D. Full Name, Mailing Address and ZIP Code Johnson Graphics, Inc. [illegible] Old Westminster Pike Westminster, MD. 21157	Purpose of Disbursement letterhead, pamphlets (voter education) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 523.04
E. Full Name, Mailing Address and ZIP Code Vince's Seafood, Inc. 118 W. Main St. Westminster, MD. 21157	Purpose of Disbursement food for dinner (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $2009.00
F. Full Name, Mailing Address and ZIP Code Staley Bros. 529 Old Baltimore Rd. Westminster, MD. 21157	Purpose of Disbursement food for dinner (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 818.00
G. Full Name, Mailing Address and ZIP Code Free Wheeling 61 Carroll St. Westminster, MD 21157	Purpose of Disbursement band for dinner (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 285.00
H. Full Name, Mailing Address and ZIP Code Pleasant Valley Fire Dept. 2330 Pleasant Valley Rd. Westminster, MD. 21157	Purpose of Disbursement hall for dinner (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 962.00
I. Full Name, Mailing Address and ZIP Code Frank Parmes 306 Park Rd. Finksburg, MD. 21048	Purpose of Disbursement postage (fundraiser) Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/29/88	Amount of Each Disbursement This Period $ 206.25

SUBTOTAL of Disbursements This Page (optional) $5,750.18

TOTAL This Period (last page this line number only)

FEC 4031117039

SCHEDULE B — ITEMIZED DISBURSEMENTS

List separately schedule(s) for each category of the Detailed Summary Page | PAGE 2 OF 3 | FOR LINE NUMBER 19

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)
Carroll County Republican Central Committee-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	advertisements (fundraiser, education) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/5/88	$ 349.61
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	postage (fundraiser, education) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	9/29/88	$ 300.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rhoten Print Shop P.O. Box 183 Westminster, MD. 21157	letters, pamphlets (education) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/14/88	$ 483.84
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Maryland Victory '88 2323 York Rd. Timonium, Md. 21093	political supplies (education) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/12/88	$ 711.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friendly Farms 1011 Baltimore Blvd. Westminster, MD. 21157	breakfast (fundraiser) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/12/88	$ 554.30
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kenneth Anderer P.O. Box 114 Braddock Height, Md. 21714	T-shirts (fundraiser) Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	8/17/88	$ 488.25
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional) | $ 2597.00

TOTAL This Period (last page this line number only) | $ 8851.13

13940131117 10

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF

FOR LINE NUMBER: 21

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NAME OF COMMITTEE (In Full)
Carroll County Republican Central Committee-Federal Account

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Alan Keyes for Senate 8115 Penton St.,Suite 314 Silver Springs, MD. 20910	contribution to Alan Keyes Senator for MD. Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/21/88	$ 999.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

12934018113

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 24

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)
Carroll County Republican Central Committee-Federal Account

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code G. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	loan repayment Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	9/15/88	$ 400.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE C
(Revised 1/98)

LOANS

Page 1 of 1 for Line Number C 1
Last report submitted for each loan, over limit

Name of Committee (In Full)
Carroll County Republican Central Committee-Federal Account

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Outstanding Payments To Date	Balance Outstanding at Close of This Period
G. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157 Election: ☐Primary ☐General ☐Other (specify):	$ 400.00	$ 400.00	$ 0.00

Terms: Date Incurred 8/17/98 Date Due none Interest Rate none %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Outstanding Payments To Date	Balance Outstanding at Close of This Period
Election: ☐Primary ☐General ☐Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (optional)	
TOTALS This Period (last page in this line only)	$ 0.00

Carry outstanding balance only to LINE 8, Schedule B, for this loan. If no Schedule B, carry forward to appropriate line of Summary.

13934611720
8113

County Republican
Committee
Account
x 2108
ster, MD. 21157

CERTIFIED

Public Records Office
Federal Election Comm.
999 E. Street, N.W.
Washington, DC 20463

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION

89 FEB 23 PM 12:15

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) [X] Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, Maryland 21074

2. FEC IDENTIFICATION NUMBER
C00232603

3. [ ] This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] Termination Report

Monthly Report Due On
- [ ] February 20
- [ ] March 20
- [ ] April 20
- [ ] May 20
- [ ] June 20
- [ ] July 20
- [ ] August 20
- [ ] September 20
- [ ] October 20
- [ ] November 20
- [ ] December 20
- [ ] January 31

[X] Twelfth day report preceding General (Type of Election) election on 11/8/88 in the State of MD

[ ] Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? [X] YES [ ] NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 1/1/88 through 10/27/88		
6	(a) Cash on Hand January 1, 1988		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 0	
	(c) Total Receipts (from Line 18)	$ 25320.11	$ 25320.11
	(d) Subtota: (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B,	$ 25320.11	$ 25320.11
7	Total Disbursements (from Line 28)	$ 12979.68	$ 12797.68
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 12340.43	$ 12340.43
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 400.00	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Jary Warren Bauer

Signature of Treasurer
Jary Warren Bauer

Date
2/13/89

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

FEC FORM 3X
(revised 4 88)

3 0 0 3 2 4 8 6 0 5 4 4 1 1 5

DETAILED SUMMARY PAGE

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

Name of Committee (in full) Carroll County Republican Central Committee-Federal Account	Report Covering the Period From 1/1/88 To 10/27/88	
I. RECEIPTS	**COLUMN A** Total This Period	**COLUMN B** Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	14005.00	14005.00	11(a)(i)
(ii) Unitemized	10915.11	10915.11	11(a)(ii)
(iii) Total of contributions from individuals	24920.11	24920.11	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	24920.11	24920.11	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED	400.00	400.00	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	25320.11	25320.11	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	9364.31	9364.31	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	2306.02	2306.02	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE	400.00	400.00	24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS	909.35	909.35	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	12979.68	12979.68	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	24920.11	24920.11	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	24920.11	24920.11	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	9364.31	9364.31	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	9364.31	9364.31	34

8 3 2 8 6 0 5 4 1 6

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 3

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232609

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
Daniel Oliver 3105 Woodley Rd. N.W. Washington, D.C. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	9/23/88	$1000.00
B. 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
Shaukat A. Ashai 11380 Heathertoe La. Columbia, MD. 21044 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
C. 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
Tariq Mohmood, M.D. 10701 Balantre La. Potomac, MD. 20854 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation: Physician Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
D. 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
Parvez Shah, M.D. 4405 Dustin Rd. Burtonsville, MD. 20866 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation: Physician Aggregate Year-to-Date > $ 1000.00	10/12/88	$1000.00
E. 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
Ann McLaughlin 2918 Garfield St. N.W. Washington, D.C. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/17/88	$1000.00
F. 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
Ruth N. Kraus 10901 Juniper Rd. Kingsville, MD. 21087 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Housewife Aggregate Year-to-Date > $ 1000.00	10/23/88	$1000.00
G. 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
Henry A. Rosenberg, Jr. P.O. Box 1168 Balto., MD. 21203 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Crown Central Petroleum Occupation: Executive Aggregate Year-to-Date > $ 1000.00	10/24/88	$1000.00

SUBTOTAL of Receipts This Page (optional)	$7000.00
TOTAL This Period (last page this line number:)	

3 2 3 8 6 0 5 1 5 1 7

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 2 OF 7

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lawrence R. Rachuba 700 Fairmount Ave. Towson, MD. 21204 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	The De Chiaro-Rachuba Group Occupation: Executive Aggregate Year-to-Date > $ 1000.00	10/25/88	$1000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John B. Burchham, Jr. 6921 Nashville Rd. Lanham, MD. 20706 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/26/88	$1000.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
W. Dale Hess 3401 Fallston Rd. Fallston, MD. 21047 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation: Real Estate Aggregate Year-to-Date > $ 1000.00	10/26/88	$1000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) $1000.00

TOTAL This Period (last page this line number only)

HEDULE A

ITEMIZED RECEIPTS

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

PAGE OF

FORM NUMBER 3(a)

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)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code Westminster Republican Women's Club 1901 Bachman Valley Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year) 9/12/88	Amount of Each Receipt this Period $ 200.00
B. Full Name, Mailing Address and ZIP Code South Carroll Republican Club 2810 Gillis Rd. Mt. Airy, MD. 21771 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year) 9/28/88	Amount of Each Receipt this Period $ 200.00
C. Full Name, Mailing Address and ZIP Code Tri-District Republican Club P.O. Box 471 Pinksburg, MD. 21048 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year) 9/29/88	Amount of Each Receipt this Period $1055.00
D. Full Name, Mailing Address and ZIP Code Carroll County Republican Club 534 Leister's Church Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year) 9/29/88	Amount of Each Receipt this Period $1400.00
E. Full Name, Mailing Address and ZIP Code Taneytown Republican Women's Club 727 Sullivan Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $	Date (month, day, year) 10/22/88	Amount of Each Receipt this Period $1150.00
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)			$ [illegible]
TOTAL This Period (last page this line)			$14005.[illegible]

EDULE B. **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 2

FOR LINE NUMBER: 21

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code Landmark Publications P.O. Box 346 Westminster, MD. 21157	Purpose of Disbursement: in-kind contributions;see allocation below Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period $ 814.76
B. Full Name, Mailing Address and ZIP Code George Bush for President 233 15th St. NW Suite 800 Washington, DC 20005	Purpose of Disbursement: advertising for George Bush, President Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $271.60 MEMO
C. Full Name, Mailing Address and ZIP Code Alan Keyes for Senate 8115 Penton St.,Suite 314 Silver Springs, MD. 20910	Purpose of Disbursement: advertising for Alan Keyes, Senate, MD Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $ 271.58 MEMO
D. Full Name, Mailing Address and ZIP Code Kenneth Halsey for Congress Oakland, MD.	Purpose of Disbursement: advertising for Kenneth Halsey House candidate,06/MD Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $ 271.58 MEMO
E. Full Name, Mailing Address and ZIP Code Carroll Sun Sherwood Square Westminster, MD. 21157	Purpose of Disbursement: in-kind contributions;see allocations below Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period $ 230.00
F. Full Name, Mailing Address and ZIP Code George Bush for President 233 15th St. NW Suite 800 Washington, DC 20005	Purpose of Disbursement: advertising for George Bush, President Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $ 75.68 MEMO
G. Full Name, Mailing Address and ZIP Code Alan Keyes for Senate 8115 Penton St., Suite 314 Silver Springs, MD. 20910	Purpose of Disbursement: advertising for Alan Keyes Senate, MD Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $ 75.65 MEMO
H. Full Name, Mailing Address and ZIP Code Kenneth Halsey for Congress Oakland, MD.	Purpose of Disbursement: advertising for Kenneth Halsey, House candidate,06/MD Disbursement for: ☐ Primary ☒ General ☐ Other (specify) 1988	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period in-kind $ 75.65 MEMO
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) $ 1,744.75

TOTAL This Period (last page, this line number only)

DULE B. **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A.	Landmark Publications P.O. Box 346 Westminster, MD. 21157	sample ballots Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 541.30
B.	Postmaster Westminster, MD. 21157	bulk-rate mailing pamphlets Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 205.08
C.	Postmaster Westminster, MD. 21157	Postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 255.00
D.		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E.		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F.		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G.		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H.		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (or page if no numbering)

$ 1001.38

EDULE B. **ITEMIZED DISBURSEMENTS**

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

PAGE 2 OF 2

FOR LINE NUMBER 21

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NAME OF COMMITTEE (In Full)

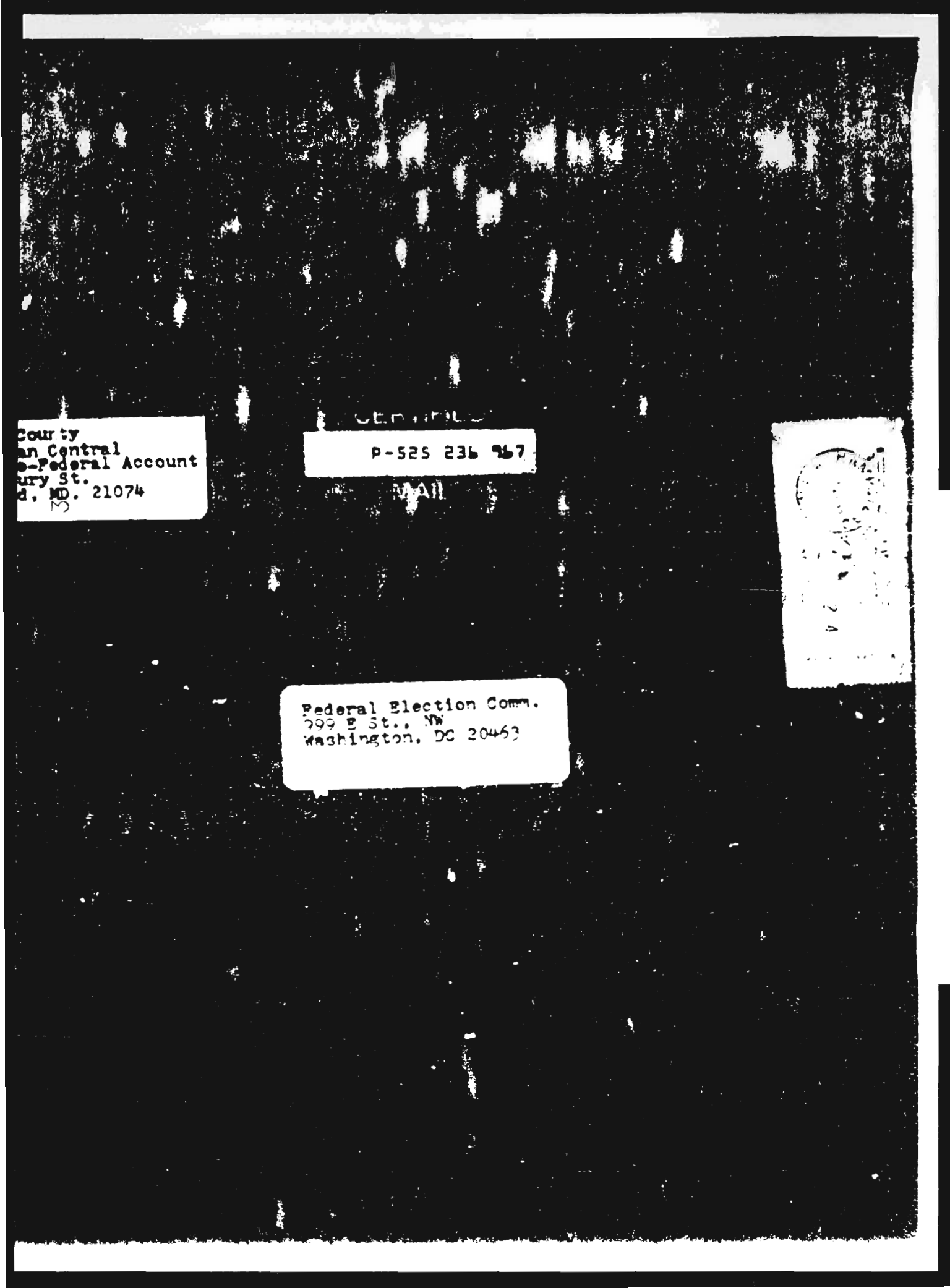
Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark rPublications P.O. Box 345 Westminster, MD. 21157	in-kind contributions:see allocations below Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/25/88	$ 262.25
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
George Bush for President 733 15th St., NW Suite 800 Washington, DC 20005	advertising for George Bush, President ☐ Primary ☒ General ☐ Other (specify) 1988	10/25/88	in-kind $ 87.42 MEMO
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Alan Keyes for Senate 9115 Penton St., Suite 314 Silver Springs, MD. 20910	advertising for Alan Keyes, Senate, MD ☐ Primary ☒ General ☐ Other (specify) 1988	10/25/88	in-kind $ 87.42 MEMO
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Kenneth Halsey for Congress Oakland, MD.	advertising for Kenneth Halsey, House candidate, 06/MD ☐ Primary ☒ General ☐ Other (specify) 1988	10/25/88	in-kind $ 87.42 MEMO
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
	☐ Primary ☐ General ☐ Other (specify)		
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (or Page if Per Election)

$ 21737.92


County
an Central
e-Federal Account
ury St.
d, MD. 21074
P-525 236 967
All
Federal Election Comm.
999 E St., NW
Washington, DC 20463

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION

88 NOV 28 AM 10:54

NAME OF COMMITTEE (in full)	Federal Account
Carroll County Republican Central Committee	
ADDRESS (number and street) ☐ Check if different than previously reported	2. FEC IDENTIFICATION NUMBER
P.O. Box 2108	C00232603
CITY, STATE and ZIP CODE	3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date)
Westminster, Maryland 21157	

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Thirtieth day report following the General Election on 11/8/88 in the State of MD

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

Covering Period 10/27/88 through 11/21/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 4643.33	
	(c) Total Receipts (from Line 18)	$ 21253.32	$ 35583.13
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A; Lines 6(a) and 6(c) for Column B)	$ 25896.65	$ 35583.13
7	Total Disbursements (from Line 28)	$ 4992.52	$ 15663.80
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 20924.33	$ 20924.33
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer: Gary Warren Bauer

Signature of Treasurer: Gary W. Bauer

Date: Nov. 21, 1988

NOTE: Submission of false, incomplete or misleading information may result in action by the Commission and/or prosecution by the Department of Justice (2 U.S.C. §437g)

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period
Carroll County Republican Federal Account Central Committee	From: 10/27/88 To: 11/21/88

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year to Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	13250.00	13250.00
(ii) Unitemized	2018.02	12933.13
(iii) Total of contributions from individuals		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	5000.00	5000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	20268.02	31183.13
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	1000.00	5005.00
13. ALL LOANS RECEIVED		400.00
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	21268.02	36588.13
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	2837.40	11200.33
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1000.00	1000.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		993.00
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		400.00
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS	4455.42	2064.42
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	4292.52	15663.80
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	20268.02	31183.13
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	20268.02	31183.13
32. TOTAL OPERATING EXPENDITURES (from Line 19)	2837.40	11200.33
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	2837.40	11200.33

EDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 1

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

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
Daniel Oliver 3105 Woodley Rd. N.W. Washington, D.C. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	9/23/88	$1000.00
B. 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
Shaukat A. Ashai 11380 Heathertoe La. Columbia, MD. 21044 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
C. 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
Tariq Mohmood, M.D. 10701 Balantre La. Potomac, MD. 2085- Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation Physician Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
D. 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
Parvez Shah, M.D. 5405 Dustin Rd. Burtonsville, MD. 20866 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation Physician Aggregate Year-to-Date > $ 1000.00	10/12/88	$1000.00
E. 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
Ann McLaughlin 2818 Garfield St. N.W. Washington, D.C. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/17/88	$1000.00
F. 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
Ruth M. Kraus 10931 Juniper Rd. Kingsville, MD. 21087 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Housewife Aggregate Year-to-Date > $ 1000.00	10/23/88	$1000.00
G. 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
Henry A. Rosenberg, Jr. [illegible] Balto., MD. 21203 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Crown Central Petroleum Occupation Executive Aggregate Year-to-Date > $ [illegible]	10/24/88	$1000.00
SUBTOTAL of Receipts This Page (optional)			$7000.00
TOTAL This Period (last page this line number only)			

HEDULE A — ITEMIZED RECEIPTS

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

PAGE 2 OF 3

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

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
Lawrence P. Rachuba 700 Fairmount Ave. Towson, MD. 21204 Receipt For: ___ Primary ___ General ___ Other (specify)	The De Chiaro-Rachuba Group Executive $ 1000.00	10/25/88	$1000.00
B 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
John S. Burchham, Jr. 6921 Nashville Rd. Lanham, MD. 20706 Receipt For: ___ Primary ___ General ___ Other (specify)	Information Requested $ 1000.00	10/26/88	$1000.00
C 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
A. Dale Hess 3401 Fallston Rd. Fallston, MD. 21047 Receipt For: ___ Primary ___ General ___ Other (specify)	Information Requested Real Estate $ 1000.00	10/26/88	$1000.00
D 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
Jean M. Shannon 6911 Bolton Ln. Temple Hills, MD. 20748 Receipt For: ___ Primary ___ General ___ Other (specify)	Information Requested $ 250.00	10/27/88	$ 250.00
E 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
Jamie R. Frank [illegible] Frederick Ave. [illegible], MD. 21[illegible] Receipt For: ___ Primary ___ General ___ Other (specify)	Information requested $	10/25/88	$ 500.00
F 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
[illegible] J. Alessi, Jr. [illegible] Parkway Rd. [illegible], MD. [illegible] Receipt For: ___ Primary ___ General ___ Other (specify)	Information requested $	10/27/88	$ 500.00
G 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
[illegible] Receipt For: ___ Primary ___ General ___ Other (specify)	Information requested $	[illegible]	[illegible]

SUBTOTAL [illegible]

TOTAL [illegible]

HEDULE A — ITEMIZED RECEIPTS

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

PAGE ___ OF ___

FOR ... NUMBER

...y 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)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code Drive Political Fund 25 Louisiana Ave. N.W. Washington, D.C. 2000...	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year) 10/31/85	Amount of Each Receipt this Period $5000.00
Receipt For: ___ Primary ___ General ___ Other (specify)			
B. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			
C. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			
D. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			
E. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			
F. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			
G. 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
Receipt For: ___ Primary ___ General ___ Other (specify)			

SUBTOTAL

HEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF

FOR LINE NUMBER: 11

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)

Carroll County Republican Central Committee - Federal Account C00232503

A. Full Name, Mailing Address and ZIP Code Gentry Re-Elect Committee Inc. 88 P. O. Box 1061 Towson, MD. 21286	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year) 10/28/88	Amount of Each Receipt this Period $1000.00
Receipt For: Primary General Other (specify)			
B. 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
Receipt For: Primary General Other (specify)			
C. 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
Receipt For: Primary General Other (specify)			
D. 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
Receipt For: Primary General Other (specify)			
E. 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
Receipt For: Primary General Other (specify)			
F. 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
Receipt For: Primary General Other (specify)			
G. 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
Receipt For: Primary General Other (specify)			

SUBTOTAL

TOTAL

SCHEDULE B — ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page — PAGE ___ OF ___ — FULL 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 contribution from such committee.

NAME OF COMMITTEE (in Full)
Carroll County Republican Central Committee -Federal Account C00232[illegible]

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ [illegible]
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Sample Ballots Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ [illegible]
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	Postage Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 255.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Carroll Sun Sherwood Square Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 250.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/25/88	$ 202.20
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
[illegible] [illegible] [illegible]	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	11/1/88	$ 725.
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
[illegible] [illegible] [illegible]	Flyer for Volunteers Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	12/88	$ [illegible]
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
[illegible] [illegible] [illegible]	Bike-Rate Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/28/88	$ [illegible]
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional) $ [illegible]

TOTAL This Period (last page with this line number only) $ [illegible]

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE

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)

Carroll County Republican Central Committee - Federal Account

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code ently Re-Elect Committee Inc P.O. Box 10619 Towson, MD. 21285	Disbursement for ___ Primary ___ General ___ Other (specify)	11/7/88	$1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ___ Primary ___ General ___ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page with this line number only)			

CERTIFIED

MAIL

08 NOV 28 AM 10:54

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION

89 FEB 23 PM 12:15

1. NAME OF COMMITTEE (in full)	2. FEC IDENTIFICATION NUMBER
Carroll County Republican Central Committee-Federal Account	C00232603
ADDRESS (number and street) [X] Check if different than previously reported 924 Century Street	
CITY, STATE and ZIP CODE Hampstead, Maryland 21074	3. [ ] This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [ ] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] Termination Report

Monthly Report Due On
- [ ] February 20
- [ ] March 20
- [ ] April 20
- [ ] May 20
- [ ] June 20
- [ ] July 20
- [ ] August 20
- [ ] September 20
- [ ] October 20
- [ ] November 20
- [ ] December 20
- [ ] January 31

[ ] Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

[X] Thirtieth day report following the General Election on 11/8/88 in the State of MD

(b) Is this Report an Amendment? [X] YES [ ] NO

SUMMARY

Covering Period 10/27/88 through 11/21/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 12340.43	
	(c) Total Receipts (from Line 18)	$ 11268.02	$ 36588.13
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 23608.45	$ 36588.13
7	Total Disbursements (from Line 28)	$ 2684.12	$ 15663.80
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 20924.33	$ 20924.33
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Gary Warren Bauer

Signature of Treasurer

Date
2/13/89

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

FEC FORM 3X
(revised 4 87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full) Carroll County Republican Central Committee-Federal Account	Report Covering the Period From: 10/27/88 To: 11/21/88	
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	3250.00	17255.00
(ii) Unitemized	2018.02	12933.13
(iii) Total of contributions from individuals	5268.02	30188.13
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	5000.00	5000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	10268.02	35188.13
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	1000.00	1000.00
13 ALL LOANS RECEIVED		400.00
14 LOAN REPAYMENTS RECEIVED		
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17 OTHER RECEIPTS (Dividends, Interest, etc.)		
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	11268.02	35588.13
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES		9364.31
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1000.00	1000.00
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	325.00	2531.02
22 INDEPENDENT EXPENDITURES (use Schedule E)		
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24 LOAN REPAYMENTS MADE		400.00
25 LOANS MADE		
26 REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27 OTHER DISBURSEMENTS	1359.12	2268.47
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2684.12	15563.80
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	10268.02	35188.13
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	10268.02	35188.13
32 TOTAL OPERATING EXPENDITURES (from Line 19)	0	9364.31
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	0	9364.31

DULE A

ITEMIZED RECEIPTS

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

PAGE 1 | 1

FOR LINE NUMBER 11(a)

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 use, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code Tudor Manor Partnership 23 Ellendale St. Bel Air, MD. 21014	Name of Employer see below	Date (month, day, year) 11/7/88	Amount of Each Receipt this Period $2000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation law firm	Aggregate Year-to-Date > $	
B. Full Name, Mailing Address and ZIP Code Leone W. Hendrox 1100 Schucks Rd. Bel Air, MD. 21014	Name of Employer Tudor Manor Partnership	Date (month, day, year) 11/7/88	Amount of Each Receipt this Period $2000.00 MEMO
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation lawyer	Aggregate Year-to-Date > $ 2000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > $	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > $	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > $	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > $	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > $	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$2000.00

EDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 21

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)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WTTR 101 WTTR La. Uniontown Rd. Westminster, MD. 21157	in-kind contributions;see allocations below Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/1/88	$ 325.00
B. Full Name, Mailing Address and ZIP Code George Bush for President 733 15th St., NW Suite 800 Washington, DC 20005	Purpose of Disbursement advertising for George Bush, President Disbursement for ☐ Primary ☒ General ☐ Other (specify) 1988	11/1/88	Amount of Each Disbursement This Period in-kind $108.34 MEMO
C. Full Name, Mailing Address and ZIP Code Alan Keyes for Senate 8115 Fenton St., Suite 314 Silver Springs, MD. 20910	Purpose of Disbursement advertising for Alan Keyes, Senate, MD Disbursement for ☐ Primary ☒ General ☐ Other (specify) 1988	11/1/88	Amount of Each Disbursement This Period in-kind $108.33 MEMO
D. Full Name, Mailing Address and ZIP Code Kenneth Halsey for Congress Oakland, MD.	Purpose of Disbursement advertising for Kenneth Halsey, House candidate, 06/MD Disbursement for ☐ Primary ☒ General ☐ Other (specify) 1988	11/1/88	Amount of Each Disbursement This Period in-kind $108.33 MEMO
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) $ 325.31

DULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 27

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 use, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Carroll County Republican Cnetral Committee-federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Sharon Hornberger 30 Chase St. Westminster, MD. 21157	pins for volunteers Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/2/88	$ 204.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) $ 204.00

CERTIFIED
P-525 236 967
MAIL
Federal Election Comm.
999 E St., NW
Washington, DC 20463

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Central
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D. 21074

P-525 236 9

MAIL

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JAN 31 PM 12:23

1 C00232603 N 235 122088
GARY WARREN BAUER
CARROLL COUNTY REPUBLICAN CENT
RAL COMMITTEE-FEDERAL ACCOUNT
PO BOX 2108
WESTMINSTER MD 21157

2. FEC IDENTIFICATION NUMBER
C00232603

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 1/1/88 through 12/31/88		
6	(a) Cash on Hand January 1, 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 0	
	(c) Total Receipts (from Line 18)	$ 37075.38	$ 37075.38
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 37075.38	$ 37075.38
7	Total Disbursements (from Line 28)	$ 20243.70	$ 20243.70
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 16832.68	$ 16832.68
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Gary Warren Bauer

Signature of Treasurer
Gary Warren Bauer

Date
1/29/89

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 8, FEC FORM 3X)

Name of Committee (in full) Carroll County Republican Central Committee - Federal Account	Report Covering the Period From: 1/1/88 To 12/31/89		
I. RECEIPTS	**COLUMN A Total This Period**	**COLUMN B Calendar Year-To-Date**	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	13250.00	13250.00	11(a)(i)
(ii) Unitemized	13421.38	13421.38	11(a)(ii)
(iii) Total of contributions from individuals	26671.38	26671.38	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)	5000.00	5000.00	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	31671.38	31671.38	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	5005.00	5005.00	12
13. ALL LOANS RECEIVED	400.00	400.00	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	37076.38	37076.38	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	15036.25	15036.25	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1500.00	1500.00	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	999.00	999.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE	400.00	400.00	24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS	2307.34	2307.34	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	20243.79	20243.79	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	31671.38	31671.38	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	31671.38	31671.38	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	15036.25	15036.25	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	15036.25	15036.25	34

EDULE A — ITEMIZED RECEIPTS

Use for entries submitted for each category of the Detailed Summary Page

PAGE 1 OF 2

FOR LINE NUMBER: 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Daniel Oliver 3106 Woodley Rd. N.W. Washington, D.C. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	9/23/88	$1000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Shaukat A. Athai 11390 Heathertoe La. Columbia, MD. 21044 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Tariq Mahmood, M.D. 10701 Balantre La. Potomac, MD. 20854 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation Physician Aggregate Year-to-Date > $ 1000.00	10/11/88	$1000.00
D. Full name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Parvez Shah, M.D. 4405 Dustin Rd. Burtonsville, MD. 20866 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Self Occupation Physician Aggregate Year-to-Date > $ 1000.00	10/12/88	$1000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ann McLaughlin 2019 Garfield St. N.W. Washington, DC. 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Occupation Aggregate Year-to-Date > $ 1000.00	10/17/88	$1000.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ruth Y. Kraus 10201 Juniper Rd. Kingsville, MD. 21087 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Housewife Aggregate Year-to-Date > $ 1000.00	10/23/88	$1000.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Henry A. Rosenberg, Jr. P.O. Box 1168 Baltimore, MD. 21203 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Crown Central Petroleum Occupation Executive Aggregate Year-to-Date > $ 1000.00	10/24/88	$1000.00

SUBTOTAL of Receipts This Page (optional): $7000.00

TOTAL This Period (last page this line number only)

8 0 3 3 8 1 3 7 0 1

HEDULE A **ITEMIZED RECEIPTS**

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

PAGE 2 OF 2

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

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
Lawrence R. Rachuba 700 Fairmount Ave. Towson, MD. 21204 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	The De Chiaro-Rachuba Group Executive $ 1000.00	10/25/88	$1000.00
B. 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
John B. Burchham,Jr. 6021 Nashville Rd. Lanham, MD. 20706 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested $ 1000.00	10/25/88	$1000.00
C. 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
T. Dale Hagg 3201 Fallston Rd. Fallston, MD. 21047 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested Real Estate $ 1000.00	10/25/88	$1000.00
D. 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
Jean M. Shannon 5811 Holton La. Temple Hills, MD. 20748 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested $ 250.00	10/27/88	$ 250.00
E. 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
Jayne M. Blank 10005 Frederick Ave. Kensington, MD. 20895 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested $ 500.00	10/28/88	$ 500.00
F. 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
Donald J. Alessi,Sr. 30 Oakway 24. Timonium, MD. 21093 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested $ 500.00	11/7/88	$ 500.00
G. 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
Sudan Manor Partnership 23 Ellendale Ct. Bel Air, MD. 21014 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Information Requested $ 2000.00	11/7/88	$2000.00
SUBTOTAL of Receipts This Page (optional)			$6250.00
TOTAL This Period (last page this line number only)			$11250.00

HEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF 1

FOR LINE NUMBER 11(a)

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NAME OF COMMITTEE (in Full)

Carroll County Republican Central Committee - Federal Account C00232603

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
Drive Political Fund 25 Louisiana Ave. N.W. Washington, DC. 20001 Receipt For ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 5000.00	10/31/88	$5000.00
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)			
TOTAL This Period (or Year) (last page this line number only)			$5000.00

HEDULE A — ITEMIZED RECEIPTS

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

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FOR LINE NUMBER: 12

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Westminster Republican Women's Club 1801 Bachmans Valley Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 200.00	9/12/88	$ 200.00
B. Full Name, Mailing Address and ZIP Code South Carroll Republican Club 2810 Gillis Rd. Mt. Airy, MD. 21771 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 200.00	9/28/88	$ 200.00
C. Full Name, Mailing Address and ZIP Code 3rd-District Republican Club P.O. Box 471 Pikesburg, MD. 21048 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $1055.00	9/29/88	$1055.00
D. Full Name, Mailing Address and ZIP Code Carroll County Republican Club [illegible] Leister's Church Rd. Westminster, MD. 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $1400.00	9/29/88	$1400.00
E. Full Name, Mailing Address and ZIP Code Taneytown Republican Women's Club 722 Sullivan Rd. Westminster, MD 21157 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 1150.00	10/22/88	$1150.00
F. Full Name, Mailing Address and ZIP Code Bentley Re-Elect CommitteeInc.88 P.O. Box 10513 Towson, MD. 21285 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $1000.00	10/29/88	$1000.00
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) [illegible]

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 6 of 1

FOR LINE NUMBER: 11

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
T. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	Mills Communications	8/17/99	$ 400.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Self		
	Aggregate Year-to-Date > $ 400.00		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	$ 400.00

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SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 3

FOR LINE NUMBER: 23

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232503

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert Frey c/o Larry Haines 140 Village Shopping Center Westminster, MD. 21157	Headquarter Lease Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/29/88	$ 600.00
B. Full Name, Mailing Address and ZIP Code Swain Supply, Inc. c/o Donald Taylor P.O. Box 519 Westminster, MD. 21157	Purpose of Disbursement supplies for dinner Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/31/88	Amount of Each Disbursement This Period $ 240.40
C. Full Name, Mailing Address and ZIP Code C & P Telephone P.O Box 557 Balto., MD. 21265	Purpose of Disbursement phone for HQ Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 305.49
D. Full Name, Mailing Address and ZIP Code Frank Ramms 1905 Tank Rd. Pinksburg, MD. 21048	Purpose of Disbursement postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/25/88	Amount of Each Disbursement This Period $ 206.25
E. Full Name, Mailing Address and ZIP Code Kenneth Andeer P.O. Box 114 Braddock Height, MD. 21714	Purpose of Disbursement T-shirts Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 8/17/88	Amount of Each Disbursement This Period $ 488.25
F. Full Name, Mailing Address and ZIP Code Johnson Graphics, Inc. 620 614 Westminster Pike Westminster, MD. 21157	Purpose of Disbursement letterhead, Pamphlets Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/2/88	Amount of Each Disbursement This Period $ 528.04
G. Full Name, Mailing Address and ZIP Code Lincoln Seafood, Inc. 118 W. Main St. Westminster, MD. 21157	Purpose of Disbursement food for dinner Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 2009.00
H. Full Name, Mailing Address and ZIP Code Italy Bros. 620 Old Baltimore Rd. Westminster, MD. 21157	Purpose of Disbursement food for dinner Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 919.00
I. Full Name, Mailing Address and ZIP Code Tree Wheeler 60 Carroll St. Westminster, MD. 21157	Purpose of Disbursement Band for dinner Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9/3/88	Amount of Each Disbursement This Period $ 295.00

SUBTOTAL of Disbursements This Page (optional) $ 5497.43

TOTAL This Period (last page this line number only)

HEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 3

FOR LINE NUMBER 15

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pleasant Valley Fire Dept. 3930 Pleasant Valley Rd. Westminster, MD. 21157	Hall for dinner Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/3/88	$ 962.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/29/88	$ 300.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Advertisements Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/5/88	$ 349.61
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Maryland Victory '88 2323 York Rd. Timonium, MD. 21093	political supplies Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/12/88	$ 711.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friendly Farms 9911 Baltimore Blvd. Westminster, MD. 21157	Breakfast Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/12/88	$ 564.30
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Shorten Print Shop P.O. Box 193 Westminster, MD. 21157	letters, pamphlets Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/14/88	$ 493.94
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Advertisements Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 814.76
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Landmark Publications P.O. Box 346 Westminster, MD. 21157	Sample Ballots Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 541.30
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Westminster, MD. 21157	postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 255.00

SUBTOTAL of Disbursements This Page (optional) — $ 4,231.91

TOTAL This Period (last page this line number only)

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 3 | 7

FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

	A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
15	Carroll Sun Sherwood Square Westminster, MD. 21157	Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 230.00
16	B. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	Purpose of Disbursement Bulk-Rate Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period $ 205.08
17	C. Full Name, Mailing Address and ZIP Code Landmark Publicantions P.O. Box 345 Westminster, MD. 21157	Purpose of Disbursement Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/25/88	Amount of Each Disbursement This Period $ 262.25
18	D. Full Name, Mailing Address and ZIP Code WTTR 101 WTTR La. Uniontown Rd. Westminster, MD. 21157	Purpose of Disbursement Advertisements Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/1/88	Amount of Each Disbursement This Period $ 325.00
19	E. Full Name, Mailing Address and ZIP Code Sharon Hornberger 30 Chase St. Westminster, MD. 21157	Purpose of Disbursement pins for volunteers Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/2/88	Amount of Each Disbursement This Period $ 204.00
20	F. Full Name, Mailing Address and ZIP Code Ambassador John Gavin 2121 Avenue of the Stars Suite 3300 Los angeles, Calif. 90067	Purpose of Disbursement outside service Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/14/88	Amount of Each Disbursement This Period $2012.68
21	G. Full Name, Mailing Address and ZIP Code Admiral Limousine Service 1104 Princess At. Alexandria, VA. 22314	Purpose of Disbursement outside Srevice Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/14/88	Amount of Each Disbursement This Period $ 460.50
	H. Full Name, Mailing Address and ZIP Code International Limousine Service 1515 Annapolis Rd.	Purpose of Disbursement outside service Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/30/88	Amount of Each Disbursement This Period $ 500.00
	I. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	Purpose of Disbursement postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/15/88	Amount of Each Disbursement This Period $ 325.00

SUBTOTAL of Disbursements This Page (optional) — $ [illegible]

TOTAL This Period (last page this line number only) — $ [illegible]

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

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FOR LINE NUMBER 12

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)

Carroll County Republican Central Committee - Federal Account C00232603

	A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Carroll Sun Sherwood Square Westminster, MD. 21157	Advertisements Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/20/88	$ 230.00
	B. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	Purpose of Disbursement Bulk-Rate Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period $ 205.08
	C. Full Name, Mailing Address and ZIP Code Landmark Publicantions P.O. Box 346 Westminster, MD. 21157	Purpose of Disbursement Advertisements Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/25/88	Amount of Each Disbursement This Period $ 252.26
	D. Full Name, Mailing Address and ZIP Code WTTR 101 WTTR La. Uniontown Rd. Westminster, MD. 21157	Purpose of Disbursement Advertisements Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/1/88	Amount of Each Disbursement This Period $ 325.00
	E. Full Name, Mailing Address and ZIP Code Sharon Hornberger 330 Chase St. Westminster, MD. 21157	Purpose of Disbursement ping for volunteers Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/2/88	Amount of Each Disbursement This Period $ 204.00
	F. Full Name, Mailing Address and ZIP Code Ambassador John Gavin 2121 Avenue of the Stars Suite 3300 Los Angeles, Calif. 90067	Purpose of Disbursement outside service Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/14/88	Amount of Each Disbursement This Period $2012.69
	G. Full Name, Mailing Address and ZIP Code Admiral Limousine Service 1104 Princess St. Alexandria, VA. 22314	Purpose of Disbursement outside Srevice Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/14/88	Amount of Each Disbursement This Period $ 460.50
	H. Full Name, Mailing Address and ZIP Code International Limousine Service 646 Annapolis Rd. [illegible], MD. 21090	Purpose of Disbursement outside service Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/20/88	Amount of Each Disbursement This Period $ 500.00
	I. Full Name, Mailing Address and ZIP Code Postmaster Westminster, MD. 21157	Purpose of Disbursement postage Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/16/88	Amount of Each Disbursement This Period $ 325.00

SUBTOTAL of Disbursements This Page (options)

TOTAL This Period (last page this line number only)

HEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 05

FOR LINE NUMBER

y 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)

Carroll County Republican Central Commitee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bentley Re-Elect Committee Inc. 88 P.O. Box 10613 Towson, MD 21285	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/7/88	$1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Carroll County Republican Central Committee P.O. Box 2108 Westminster, MD. 21157	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/1/88	$ 500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 21 OF

FULL 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)

Carroll County Republican Central Committee - Federal Account C00232603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Allan Keyes for Senate 8115 Fenton St., Suite 314 Silver Spring, MD. 20910	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/21/88	$ 999.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

HEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE OF

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NAME OF COMMITTEE (In Full)

Carroll County Republican Central Committee - Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Melvin Mills 727 Sullivan Rd. Westminster, MD. 21157	Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/15/98	$ 400.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

Fold at line over top of envelope to the right of the return address

CERTIFIED

P-525 236 136

MAIL

Public Records Office
Federal Election Comm.
999 E Street, NW
Washington, DC 20463

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FEDERAL ELECTION COMMISSION

83 MAR -2 AM 11:20

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (In Full)
Carroll County Republican Central Committee-Federal Account

ADDRESS (number and street) [X] Check if different than previously reported
924 Century Street

CITY, STATE and ZIP CODE
Hampstead, MD. 21074

2. FEC IDENTIFICATION NUMBER
C00232603

3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [X] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] Termination Report

Monthly Report Due On
- [ ] February 20
- [ ] March 20
- [ ] April 20
- [ ] May 20
- [ ] June 20
- [ ] July 20
- [ ] August 20
- [ ] September 20
- [ ] October 20
- [ ] November 20
- [ ] December 20
- [ ] January 31

[ ] 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 _____

(b) Is this Report an Amendment? [X] YES [ ] NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 11/21/88 through 12/31/88		
6	(a) Cash on hand January 1 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 20924.33	
	(c) Total Receipts (from Line 18)	$ 0	$ 36588.13
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 20924.33	$ 36588.13
7	Total Disbursements (from Line 28)	$ 4091.65	$ 19755.45
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 16832.68	$ 16832.68
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street NW
Washington, DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Gary Warren Bauer

Signature of Treasurer

Date
2/23/89

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

FEC FORM 3X

(Revised 4/87)

39000420863707354

DETAILED SUMMARY PAGE

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

Name of Committee (in full) Carroll County Republican Central Committee-Federal Account C00232603

Report Covering the Period From 11/21/88 To 12/31/08

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		17255.00	11(a)(i)
(ii) Unitemized		12933.13	11(a)(ii)
(iii) Total of contributions from Individuals		30188.13	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)		5000.00	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		35188.13	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		1000.00	12
13 ALL LOANS RECEIVED		400.00	13
14 LOAN REPAYMENTS RECEIVED			14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17 OTHER RECEIPTS (Dividends, Interest, etc.)			17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		36588.13	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	3348.18	12712.49	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	500.00	1500.00	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		2631.02	21
22 INDEPENDENT EXPENDITURES (use Schedule E)			22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24 LOAN REPAYMENTS MADE		400.00	24
25 LOANS MADE			25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b) and (c))			26(d)
27 OTHER DISBURSEMENTS	243.47	2511.94	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	4091.65	19755.45	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	0	35188.13	29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	0	35188.13	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	3348.18	12712.49	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	3348.18	12712.49	34

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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)

Carroll County Republican Central Committee-Federal Account C00232603

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Ambassador John Gavin 2121 Avenue of the Stars Suite 3000 Los Angeles, Calif. 90067	travel expenses Amb. Gavin Primary / General	12/14/88	$2012.68
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Admiral Limousine Service 7104 Princess St. Alexandria, VA. 22314	travel expenses Amb. Gavin Primary / General	12/14/88	$ 450.50
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
International Limousine Service 4545 Annapolis Rd. Balto., MD. 21227	travel expenses Congresswoman Bentley Primary / General	12/30/88	$ 500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Balto, MD.	postage Primary / General	12/15/88	$ 375.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Primary / General		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Primary / General		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Primary / General		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Primary / General		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Primary / General		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page with this line number only)

$3384.18

3 13 8 6 3 7 2 7 2

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 22

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)

Carroll County Republican Central Committee-Federal Account C0023603

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Carroll County Republican Central Committee P.O. Box 2109 Westminster, MD. 21157	transfer Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/1/88	$ 500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL

arroll County Republican
entral Committee-Federal Account
24 Century St.
ampstead, MD. 21074

CERTIFIED
P-525 236 781
MAIL

Public Records Office
Federal Election Commission
999 E St., NW
Washington, DC 20463

RETURN RECEIPT
REQUESTED

RETURN RECEIPT
REQUESTED

89 MAR -2 AM 11:20

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-1

OCT 12 [illegible]

Gary Warren Bauer, Treasurer
Carroll County Republican Central
Committee - Federal Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: Statement of Organization

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Your Statement of Organization discloses the type of your committee as being the principal campaign committee of George Bush for President. Please note that George Bush for President Inc. is the campaign committee of this candidate. While the Act precludes a candidate from forming more than one principal campaign committee, you may qualify as an "authorized committee". The Act defines an authorized committee as being "any political committee that is authorized by a candidate to incur expenses on behalf of such candidate". The term "authorized committee" includes the candidate's principal campaign committee designated in accordance with 11 CFR 102.12, any political committee authorized in writing by the candidate in accordance with 11 CFR 102.13 and any political committee not disavowed by the candidate pursuant to 11 CFR 100.3(a)(3). (11 CFR 9002.1(a)). Please clarify the actual type of your committee.

-Please clarify your relationship, if any, with the Republican State Central Committee of Carroll County and the Republican State Central Committee of Maryland - Federal which appear to be affiliated committees. For further guidance on the question of affiliation, please refer to 11 CFR 100.5(g).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Paul W. Dickson
Reports Analyst
Reports Analysis Division

8030349012737360

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE (in full) — (Check if name is changed)
Carroll County Republican Central Committee-Federal

1. DATE 88 SEP 26 AM 11:25
Jan. 21, 1988

2. (a) Number and Street Address — (Check if address is changed)
P.O. Box [illegible]

2. FEC IDENTIFICATION NUMBER

(b) City, State and ZIP Code
Westminster, Maryland 21157

4. IS THIS STATEMENT AN AMENDMENT?
☐ YES ☒ NO

5. TYPE OF COMMITTEE (Check one)

☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate's Party Affiliation	Office Sought	State/District
George Bush	Republican	President	AL/STR

☐ (c) This committee supports/opposes only one candidate: _____ and is NOT an authorized committee.
(Name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(Persons, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

6. Type of Connected Organization
☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
[illegible]		Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Mary Warren Bauer [illegible]	[illegible] Century Street [illegible], Md. 21157	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
[illegible]	[illegible] East Main Street Westminster, Maryland 2[illegible]

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Mary Warren Bauer	[signature]	[illegible]

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further information contact:
Federal Election Commission
Toll free 800 424 9530

FEC FORM 1

[redacted]

[redacted]

[redacted]

Federal Election Commission
[redacted]
Washington, DC 20463

[redacted]

Carroll County Republican Central
Committee-Federal Account
P.O. Box 2108
Westminster, Maryland 21157
FEC# C00232603

October 20, 1988

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

Dear Gentlemen:

This letter is to notify you that I need to amend the Statement of Organization that was submitted on September 17, 1988. I had indicated that this committee was a principal campaign committee which it was not.

I wish to amend the Statement of Organization from line 5(a) to 5(d). The line 5(d) should read "This committee is a subordinate committee of the Republican Party."

This committee is supporting all Republican candidates for the offices President, Senate, and the House in Maryland 6th Congressional District.

In reference to your letterof October 12, this committee is the Carroll County Republican Central Committee and its members set on the Republican Central Committee of Maryland. This committee established a federal account to keep monies raised to support Republican candidates separate from its normal operating account.

Thank you for your patience and cooperation. I hope this letter will correct the errors in the original Statement of Organization.

Yours truly,

Gary W. Bauer
Treasurer

PEC:gwb

8803590097363

[redacted]County Republican Central Committee
[redacted] Account
[redacted] 2108
[redacted]ster, MD. 2157

Federal Election Commission
[redacted] E Street, N.W.
Washington, D.C. 20463

88 OCT 22 AM 9:39

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HQ-2

FEB 8 [illegible]

Gary Warren Bauer, Treasurer
Carroll County Republican
Central Committee Federal
Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: 12 Day Pre-General Report (1/1/88-10/27/88)

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to

influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 30 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Please provide the totals for Line 11(a)(iii), Columns A and B of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Hageman

Todd S. Hageman
Reports Analyst
Reports Analysis Division

9004031 7566

Carroll County Republican Central Committee-Federal Account

Westminster Republican Women's Club 1801 Buehmans Valley Rd. Westminster, Md. 21157		9/12/88	$ [illegible]
South Carroll Republican Club 2810 Gillis Rd. Mt. Airy, MD. 21771		9/28/88	$ 200.00
Tri-District Republican Club P.O. Box 471 Finksburg, MD. 21048		9/29/88	$1055.00
Carroll County Republican Club 534 Meister's Church Rd. Westminster, MD. 21157		9/29/88	$1400.00
Taneytown Republican Women's Club [illegible] Sullivan Rd. [illegible]minster, MD. 21157		10/22/88	$ 150.00
SUBTOTAL of this page (optional)			
TOTAL this period (last page with this number only)			

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 9 1989

Gary Warren Bauer, Treasurer
Carroll County Republican
Central Committee Federal
Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: 30 Day Post-General Report (10/27/88-11/21/88)

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has filed a report that contains financial activity that should have been reported on your 12 Day Pre-General Report.

Please amend your 30 Day Post-General Report by including only the financial transactions that occurred between 10/27/88 and 11/28/88. It is also necessary for you to amend your 12 Day Pre-General Report by including all financial activity before 10/27/88.

-Please provide the totals for Line 11(a)(iii), Columns A and B of the Detailed Summary Page.

-Please clarify all expenditures made for advertisements. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-Your report discloses limited payments for administrative expenses. Each committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the amount of funds expended on federal and non-federal elections or on another reasonable basis. Administrative expenses are those day-to-day costs of operating the committee, including

rent, utilities, salaries and other miscellaneous office expenses. The federal account of the committee must pay its share of such expenses. 11 CFR 106.1(a) and 102.5(a)(1)(i).

If your organization has incurred such administrative costs and your non-federal account has paid for all such costs, your federal account must reimburse the non-federal account for its portion of the expenses. The amount incurred by the federal account should be disclosed as a debt or obligation owed to the non-federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-You have received a contribution from Tudor Manor Partnership which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of $200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR 110.1(k).

If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contributor information. 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Rageman

Todd S. Rageman
Reports Analyst
Reports Analysis Division

8003438431

89030411770

FEDERAL ELECTION COMMISSION
89 MAR 20 PM 1:

Carroll County Republican
Central Committee
Federal Account
924 Century Street
Hampstead, Maryland 21074

March 13, 1989

Mr. Todd S. Hageman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Account No. C00232603

Dear Mr. Hageman:

Pursuant to our conversation of March 13, 1989 regarding the contributions referred to in your letter of March 2, I will need additional time to compile the information to justify these contributions to the FEC.

Thank you again for your advice and assistance in regards to this matter.

I look forward to your response on this matter.

Sincerely,

Gary W. Bauer
Treasurer
749-8[illegible]

arroll County Republican
ntral Committee-Federal Account
 Century St.
mpstead, MD. 2103-

CERTIFIED
P-525 236 486
MAIL

RETURN RECEIPT
REQUESTED

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Attn: Mr. Todd A. Hageman

RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 2, 1989

Gary Warren Bauer, Treasurer
Carroll County Republican
Central Committee Federal
Account
P.O. Box 2108
Westminster, MD 21157

Identification Number: C00232603

Reference: 12 Day Pre-General Report (1/1/88-10/27/88)

Dear Mr. Bauer:

On February 8, 1989 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 21, 1989 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your amended report deletes several contributions from unregistered organizations that were disclosed on Schedule A supporting Line 12 of your original report. Please clarify whether these contributions were deposited into your committee's federal account. If the contributions were deposited, they should be disclosed on your report, and appropriate action should be taken. If they were not deposited please notify the Commission of the disposition of these funds.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Todd S. Hageman on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

FEDERAL ELECTION COMMISSION

RQ-2

Gary Warren Bauer, Treasuer
Carroll County Republican Central
Committee-Federal Account
P.O. Box 2108
Westminster, MD 21157

FEB 15 1989

Identification Number: C00232603

Reference: Year End Report (1/1/88-12/31/88)

Dear Mr. Bauer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has filed a report which contains financial activity already disclosed on another report. Overlapping coverage dates create difficulties in accounting for cash flow from one report to another. Please amend this report by including only the financial transactions that occurred between 11/22/88 and 12/31/88. 2 U.S.C. §434(b).

-The beginning cash balance of this report should equal the ending balance of your 30 Day Post-General report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Hageman

Todd S. Hageman
Reports Analyst
Reports Analysis Division

3 2 0 4 0 3 1 1 7 3

Free State
Victory '88

1988 + 1989

20040811774

9004081775

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

FE: [illegible] '88

89 APR 19 PM 1:06

TYPE OR PRINT

1 NAME OF COMMITTEE (in full)

Freestate Victory '88

ADDRESS (number and street) Check if different than previously reported

2516 N. Charles Street

CITY STATE and ZIP CODE

Baltimore, Maryland 21218

2 FEC IDENTIFICATION NUMBER

C00232280

3 This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a) X April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Termination Report

Monthly Report Due On

February 20	June 20	October 20
March 20	July 20	November 20
April 20	August 20	December 20
May 20	September 20	January 31

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 _____

(b) Is this Report an Amendment? ___ YES [X] NO

SUMMARY

5 Covering Period 12/31/88 through 3/31/89

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)	Cash on Hand January 1, 19 89	[redacted]	$ 1,951.79
6(b)	Cash on Hand at Beginning of Reporting Period	$ 1,951.79	[redacted]
6(c)	Total Receipts (from Line 18)	$ 5,000.00	$ 5,000.00
6(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 6,951.79	$ 6,951.79
7	Total Disbursements (from Line 28)	$ 4,656.54	$ 4,656.54
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,295.25	$ 2,295.25
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	$ 0	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and or Schedule D)	$ 0	

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800 424 9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Linda Bowler Pierson

Signature of Treasurer
Linda B. P.

Date
4/15/89

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

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period		
Freestate Victory '88	From 12/31/88	To 1/31/89	
	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			
(i) Itemized (use Schedule A)	0	0	11(a)(i)
(ii) Unitemized	0	0	11(a)(ii)
(iii) Total of contributions from individuals	0	0	11(a)(iii)
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees (such as PACs)	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	0	0	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	$5,000	$5,000	12
13 ALL LOANS RECEIVED	0	0	13
14 LOAN REPAYMENTS RECEIVED	0	0	14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17 OTHER RECEIPTS (Dividends, interest, etc.)	0	0	17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	$5,000	$5,000	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	$3,656.54	$3,656.54	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	21
22 INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U S C 441a(d)) (use Schedule F)	0	0	23
24 LOAN REPAYMENTS MADE	0	0	24
25 LOANS MADE	0	0	25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals Persons Other Than Political Committees	$1,000.00	$1.000.00	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees (such as PACs)	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0	26(d)
27 OTHER DISBURSEMENTS	0	0	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	$4,656.54	$4,656.54	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	0	0	29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	0	0	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	$3,656.54	$3,656.54	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	$3,656.54	$3,656.54	34

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period From:	To
Freestate Victory '88	12/31/88	3/31/89

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11 CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	0	0	11(a)(i)
(ii) Unitemized	0	0	11(a)(ii)
(iii) Total of contributions from individuals	0	0	11(a)(iii)
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees (such as PACs)	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	0	0	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	$5,000	$5,000	12
13 ALL LOANS RECEIVED	0	0	13
14 LOAN REPAYMENTS RECEIVED	0	0	14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17 OTHER RECEIPTS (Dividends, Interest, etc.)	0	0	17
18 TOTAL RECEIPTS (add 11(d) 12, 13, 14, 15, 16 and 17)	$5,000	$5,000	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	$3,656.54	$3,656.54	19
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	21
22 INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U S C 441a(d)) (use Schedule F)	0	0	23
24 LOAN REPAYMENTS MADE	0	0	24
25 LOANS MADE	0	0	25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals Persons Other Than Political Committees	$1,000.00	$1,000.00	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees (such as PACs)	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0	26(d)
27 OTHER DISBURSEMENTS	0	0	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	$4,656.54	$4,656.54	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	0	0	29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	0	0	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	$3,656.54	$3,656.54	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33

SCHEDULE A — ITEMIZED RECEIPTS

(Transfers from affiliated/other Party Committees)

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

PAGE 1 OF 1

FOR LINE NUMBER 12

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)

Freestate Victory '88

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Carroll County Republican Central Committee-Fed. Acc't. P.O. Box 2108 Westminster, Md 21158 Receipt For: ☐ Primary ☐ General ☐ Other (specify)		2/22/89	$5,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $5,000.00		
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional) $5,000.00

TOTAL This Period (last page only) $5,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS
(Operating expenditures)

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

PAGE 1 OF 1

FOR LINE NUMBER 19

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)
Freestate Victory '88

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A	Postmaster, Baltimore, MD 21403	postage Disbursement for [ ] Primary [ ] General [ ] Other (specify)	3/1/89	$ 132.00
B	Prince Georges Co. Medical Association	printing and postage for 11/88 mailing Disbursement for [ ] Primary [X] General [ ] Other (specify)	3/16/89	$2,000.00
C	Prince of Printing 5320 Park Heights Ave Baltimore, Md. 21215	printing Disbursement for [ ] Primary [ ] General [ ] Other (specify)	3/21/89	$ 71.60
D	Veritechnology Electronic Corporation 1713 East Joppa Road Baltimore, MD. 21234	computer printer Disbursement for [ ] Primary [ ] General [ ] Other (specify)	3/27/89	$1,452.94
E	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL	$3,656.54
TOTAL	$3,656.54

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1

FOR LINE NUMBER 26 a

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)

Freestate Victory '88

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Full Name, Mailing Address and ZIP Code United Gov't Services Amalgamated Travel P.O. Box 130 Laurel, MD 20707	refund of contribution Disbursement for ☐ Primary ☐ General ☐ Other (specify)	2/7/89	$,1000.00
B Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL			$1,000.00
TOTAL			$1,000.00

tate Victory '88
Charles Street
more, Md. 21218

CERTIFIED

P 862 079 116

MAIL

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

89 AUG 19 PM 1:06

RECEIVED
FEDERAL ELECTION COMMISSION
88 DEC 22 AM 10:41

Dec 16, 1988

Gentlemen

My assistant treasurer, David Blumberg, spoke with someone in your office who stated our report had not been logged in as of Dec 15, but that it may still be "being processed." Attached is a duplicate of our report

Thank you.

Linda B. Pierson
Treasurer

3010483P17783

REPORT OF RECEIPTS AND DISBURSEMENTS

RECEIVED FEDERAL ELECTION COMMISSION

88 DEC 22 AM 10:41

For Other Than An Authorized Committee

(Summary Page)

1 NAME OF COMMITTEE (in full)
Free State Victory '88

ADDRESS (number and street) ☐ Check if different than previously reported
2516 N. Charles Street

2. FEC IDENTIFICATION NUMBER
C00232280

CITY, STATE and ZIP CODE
Baltimore maryland 21218

3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On
- ☐ February 20 ☐ June 20 ☐ October 20
- ☐ March 20 ☐ July 20 ☐ November 20
- ☐ April 20 ☐ August 20 ☐ December 20
- ☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Thirtieth day report following the General Election on 11/8/88 in the State of maryland.

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 10/20/88 through 11/28/88		
6(a)	Cash on Hand January 1, 1988		$ 0
(b)	Cash on Hand at Beginning of Reporting Period	$ 1,503.75	
(c)	Total Receipts (from Line 18)	$ 67,190.	$ 69,698
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 68,693.75	$ 69,698
7	Total Disbursements (from Line 28)	$ 65,959.90	$ 66,964.15
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,733.85	$ 2,733.85
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)	$ 0	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and or Schedule D)	$ 0	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Linda Bowler Pierson

Signature of Treasurer
Linda B Pierson

Date
12/4/88

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period From	To
Free State Victory '88	10/20/88	11/28/88

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11 CONTRIBUTIONS (other than loans) FROM			
a Individuals Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	$ 48,000.	$ 50,200.	11(a)(i)
(ii) Unitemized	4,190.	4,498.	11(a)(ii)
(iii) Total of contributions from individuals	52,190.	54,698.	11(a)(iii)
b Political Party Committees	0	0	11(b)
c Other Political Committees (such as PACs)	0	0	11(c)
d TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	$ 52,190	$ 54,698.	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	$ 15,000	$ 15,000	12
13 ALL LOANS RECEIVED	0	0	13
14 LOAN REPAYMENTS RECEIVED	0	0	14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds Rebates, etc.)	0	0	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17 OTHER RECEIPTS (Dividends, Interest, etc.)	0	0	17
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	$ 67,190	$ 69,698.	18
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES	$ 64,959.90	$ 65,964.15	19
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	0	0	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,000.	1,000.	21
22 INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	0	0	23
24 LOAN REPAYMENTS MADE	0	0	24
25 LOANS MADE	0	0	25
26 REFUNDS OF CONTRIBUTIONS TO			
a Individuals Persons Other Than Political Committees	0	0	26(a)
b Political Party Committees	0	0	26(b)
c Other Political Committees (such as PACs)	0	0	26(c)
d TOTAL CONTRIBUTION REFUNDS (add 26.a), (b), and (c))	0	0	26(d)
27 OTHER DISBURSEMENTS	0	0	27
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	$ 65,959.90	$ 66,964.15	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	$ 52,190.	$ 54,698	29
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0	30
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	$ 52,190	$ 54,698	31
32 TOTAL OPERATING EXPENDITURES (from Line 19)	$ 64,959.90	$ 65,964.15	32
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0	33
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	$ 64,959.90	$ 65,964.15	34

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 31

FOR LINE NO. 11(a)(

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)
Free State Victory '88

A Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Alice M. Blair 11610 Highland Farm Road Potomac, MD 20854 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Occupation Aggregate Year-to-Date > $ 5,000.	10/15/88	$ 5,000.
B Full Name, Mailing Address and ZIP Code Thomas L. Blair 11610 Highland Farm Road Potomac, MD 20854 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 5,000.	10/15/88	$ 5,000.
C Full Name, Mailing Address and ZIP Code Anita K. Tong 3818 Livingston St., N.W. Washington, D.C. 20015 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer: Voice of America, USA Occupation: Broadcaster, Writer Aggregate Year-to-Date > $ 5,000.	10/19/88	$ 5,000.
D Full Name, Mailing Address and ZIP Code George K. Tong 3818 Livingston St., N.W. Washington, D.C. 20015 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer: Self Occupation: International Bus. Consultant Aggregate Year-to-Date > $ 5,000.	10/19/88	$ 5,000.
E Full Name, Mailing Address and ZIP Code David B. Wiseman 100 Chautauqua Road Arnold, MD 21012 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 1,000.	10/13/88	$ 1,000.
F Full Name, Mailing Address and ZIP Code Coenraad H. Everhard 9 Wilkens Court Tiburon, CA 94920 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 5,000.	10/21/88	$ 5,000.
G Full Name, Mailing Address and ZIP Code Thelma S. Yeonas 3830 N. Tazewell St. Arlington, VA Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 1,000.	10/12/88	$ 1,000

SUBTOTAL of Receipts This Page (optional) $ 27,000

TOTAL This Period (last page this line number only)

C00401117386

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 4 OF 1

FOR LINE NUMBER 11(a)(i)

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)
Free State Victory '88

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A Full Name, Mailing Address and ZIP Code John N. Irwin II Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Occupation Aggregate Year to Date > $ 2,500.	10/18/88	$2,500.
B Full Name, Mailing Address and Zip Code Jane O. Irwin Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 2,500.	10/18/88	$2,500.
C Full Name, Mailing Address and ZIP Code Martin Jacobs 1250 Conn. Ave. NW St 800 Washington DC 20036 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Ginsburg, Feldman & Bress Chtd Occupation Attorney Aggregate Year to Date > $ 1,000.	11/1/88	$1,000.
D Full Name, Mailing Address and ZIP Code James P. Mango 10410 F Justin Way Laurel, MD 20707 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > $ 1,000.	10/31/88	$1,000.
E Full Name, Mailing Address and ZIP Code John A. Manfuso Jr 8401 Conn. Ave Chevy Chase MD 20815 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Laurel Race Course, Pimlico Race Course, Manfuso Brothers Occupation Executive Aggregate Year to Date > $ 1,000	10/28/88	$1,000
F Full Name, Mailing Address and ZIP Code Lewis M. Helm 7000 Milwood Road Bethesda MD 20817 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Retired Occupation Ret Brigdier USA Army Aggregate Year to Date > $ 500.	11/2/88	$500.
G Full Name, Mailing Address and ZIP Code Julia Lee Rubin 9021 Brickyard Rd. Potomac, MD 20854 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year to Date > $ 5,000.	11/2/88	$5,000.
SUBTOTAL of Receipts This Page (optional)			$13,500.
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 5 OF

FOR LINE NUMBER: 11(a)(i)

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)

Free State Victory '88

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Sheldon M. Gordon 11611 San Vicente Blvd. Los Angeles, CA 90049 Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Occupation: Surgeon Aggregate Year-to-Date: $ 5,000.	11/7/88	$ 5,000.
B. Full Name, Mailing Address and ZIP Code Chanceland Farms II Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year-to-Date: $ 1,000.	11/1/88	$ 1,000.
C. Full Name, Mailing Address and ZIP Code United Government Services Amalgamated Travel Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year to Date: $ 1,000.	10/29/88	$ 1,000.
D. Full Name, Mailing Address and ZIP Code David A. Metzner 1226 Michigan Ct. Arlington, VA 22314 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year-to-Date: $ 500.	10/22/88	$ 500.
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year to Date: $		
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year-to-Date: $		
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation: Aggregate Year to Date: $		

SUBTOTAL of Receipts This Page (optional) $ 7,500.

TOTAL This Period (last page this line number only) $ 48,000

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 6 OF

FOR LINE NUMBER 19

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)

Free State Victory '88

	A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Robert Dietz 2123 Maryland Ave Baltimore MD 21218	Consulting Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/22/88 10/31/88 11/7/88	$ 300. $ 300. $ 300.
	B Full Name, Mailing Address and ZIP Code continued	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/14/88	$ 800.
	C Full Name, Mailing Address and ZIP Code Ruthanne Gary One Bojan Court Millersville, MD 21108	Purpose of Disbursement reimbursement for postage Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/24/88	$ 261.50
	D Full Name, Mailing Address and ZIP Code Swanson Typesetting 5205 York Road Baltimore MD	Purpose of Disbursement printing Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/31/88	$ 2,032.80
	E Full Name, Mailing Address and ZIP Code C+H Caterers 2345 Warren St. Silver Spring, MD 20910	Purpose of Disbursement catering for fund-raiser Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/2/88	$ 771.75
	F Full Name, Mailing Address and ZIP Code Circular Advertising 1500 S. Monroe St. Baltimore MD	Purpose of Disbursement printing ballots Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/6/88	$ 3600.
	G Full Name, Mailing Address and ZIP Code Wirth-Strahler & Son, Inc. 427 East 26th Street Baltimore, MD 21218	Purpose of Disbursement printing ballots Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/4/88	$ 1,501.50
	H Full Name, Mailing Address and ZIP Code United Northern Democrats	Purpose of Disbursement pre-election day distribution of literature Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 6,600.
	I Full Name, Mailing Address and ZIP Code Independent Democratic Club 13 Warren Park Dr. Baltimore, MD 21208	Purpose of Disbursement pre-election day distribution of literature Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 4,000.
	SUBTOTAL of Disbursements This Page (optional)			$ 20,367.55
	TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 6 OF 1

FOR LINE NUMBER 19

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)

Free State Victory '88

	A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement This
	Robert Dietz 2123 Maryland Ave Baltimore MD 21218	Consulting Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/22/88 10/31/88 11/7/88	$ 300. $ 300. $ 300.
	B Full Name, Mailing Address and ZIP Code continued	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/14/88	$ 800.
	C Full Name, Mailing Address and ZIP Code Ruthanne Gary One Bojan Court Millersville, MD 21108	Purpose of Disbursement reimbursement for postage Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/24/88	$ 261.5
	D Full Name, Mailing Address and ZIP Code Swanson Typesetting 5205 York Road Baltimore MD	Purpose of Disbursement printing Disbursement for ☐ Primary ☒ General ☐ Other (specify)	10/31/88	$ 2,032.
	E Full Name, Mailing Address and ZIP Code C+H Caterers 2345 Warren St. Silver Spring, MD 20910	Purpose of Disbursement catering for fund-raiser Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/2/88	$ 771.7
	F Full Name, Mailing Address and ZIP Code Circular Advertising 1500 S. Monroe St. Baltimore MD	Purpose of Disbursement printing ballots Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/6/88	$ 3600.
	G Full Name, Mailing Address and ZIP Code Wirth-Strahler & Son, Inc. 427 East 26th Street Baltimore, MD 21218	Purpose of Disbursement printing ballots Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/4/88	$ 1,501.
	H Full Name, Mailing Address and ZIP Code United Northern Democrats	Purpose of Disbursement pre-election day distribution of literature Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 6,500.
	I Full Name, Mailing Address and ZIP Code Independent Democratic Club 13 Warren Park Dr. Baltimore MD 21208	Purpose of Disbursement pre-election day distribution of literature Disbursement for ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 4,000.

SUBTOTAL of Disbursements This Page (optional) $ 20,367.

TOTAL This Period (last page with this line number only)

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE ___ OF ___

FOR LINE NUMBER 19

Mailing lists of political committees filed with the Board of Elections Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes. Name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Free State Victory '88

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Marie A. Rogers 635 Elmoar St. Baltimore, MD 21224	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 4,000.
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Trenton Democratic Club 5803 Key Ave. Baltimore, MD 21215	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 3,500.
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
James Whitten 221 Cresswell Ave Brooklyn Pk., MD 21225	pre-election day, distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 3,250.
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wicke Foster Company 1801 Byrd Street Baltimore, MD 21230	printing posters Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 547.
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
John Kutler 917 Gravehill Road Baltimore MD 21227	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 4,000.
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Northeast Democrats P.O. Box 3687 Baltimore, MD 21214	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 3,500.
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lawrence Specca 20 E Fagley St. Baltimore MD 21224	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 5,000.
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
James Ruetschlein 305 E Highfield Rd. Baltimore, MD 21212	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 5,000.
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Edward C Fogarty 224 Southern Rd. Baltimore, MD 21204	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 5,000.
TOTAL			$ 33,797.

LE B **ITEMIZED DISBURSEMENTS**

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

PAGE 9 OF

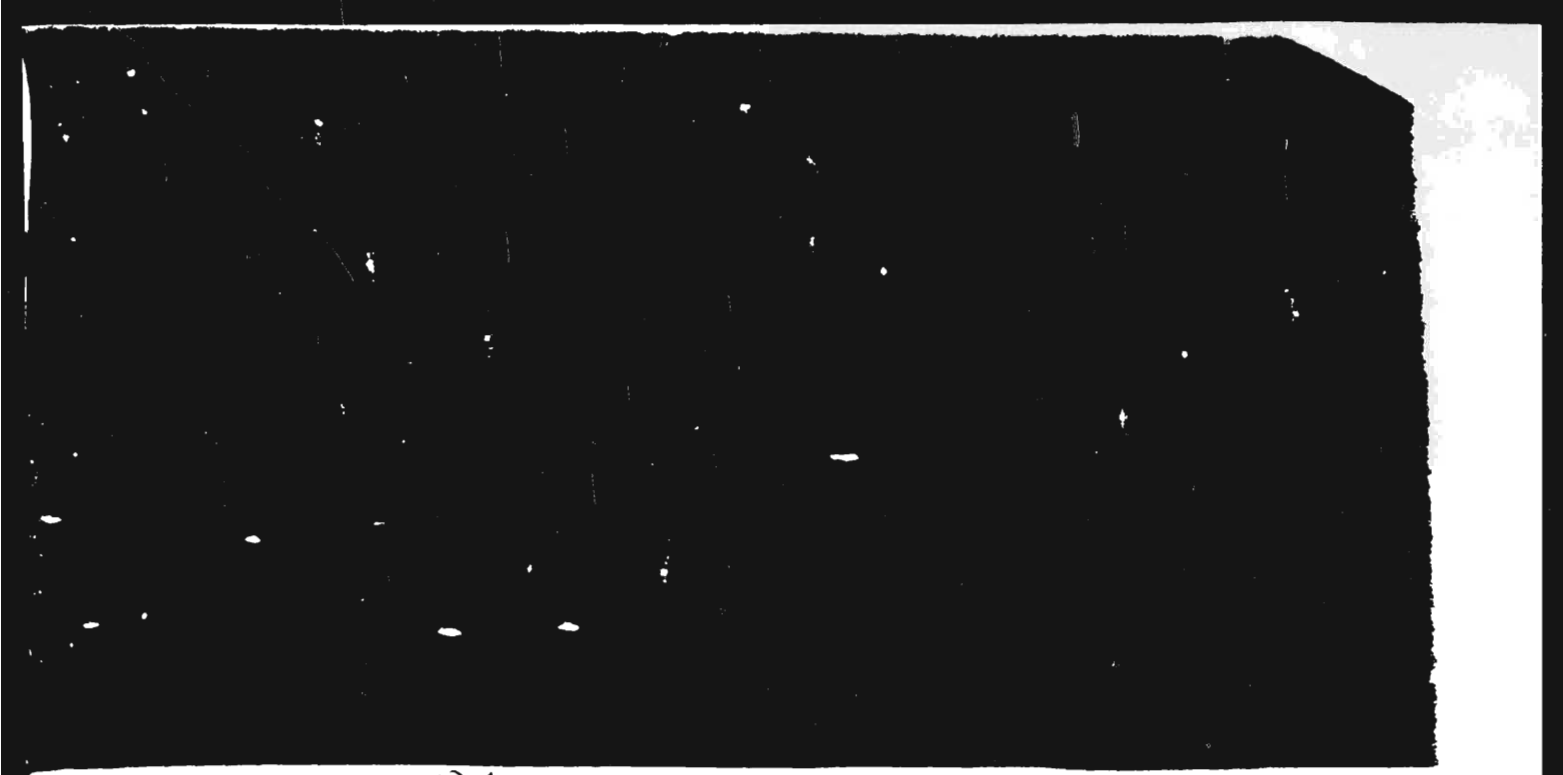
FOR LINE NUMBER 19

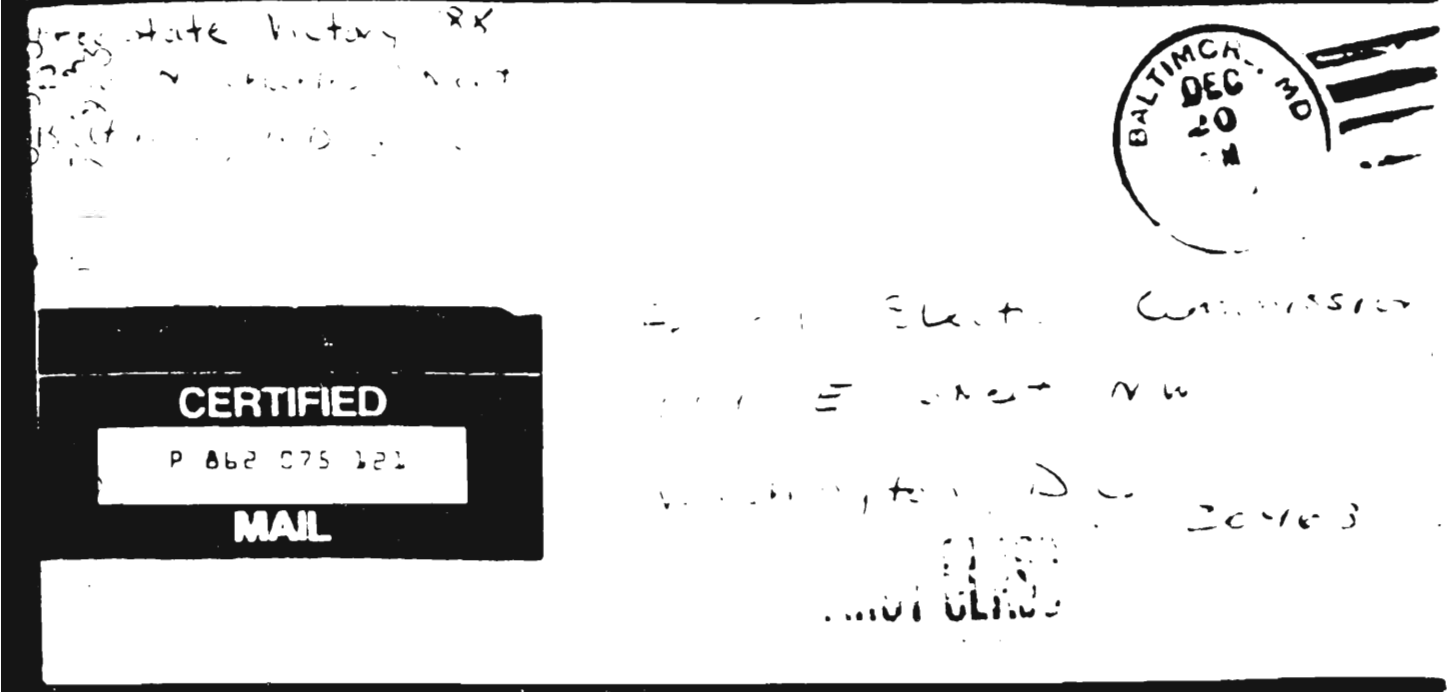
Sale, purchase or copying of lists of contributors on such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

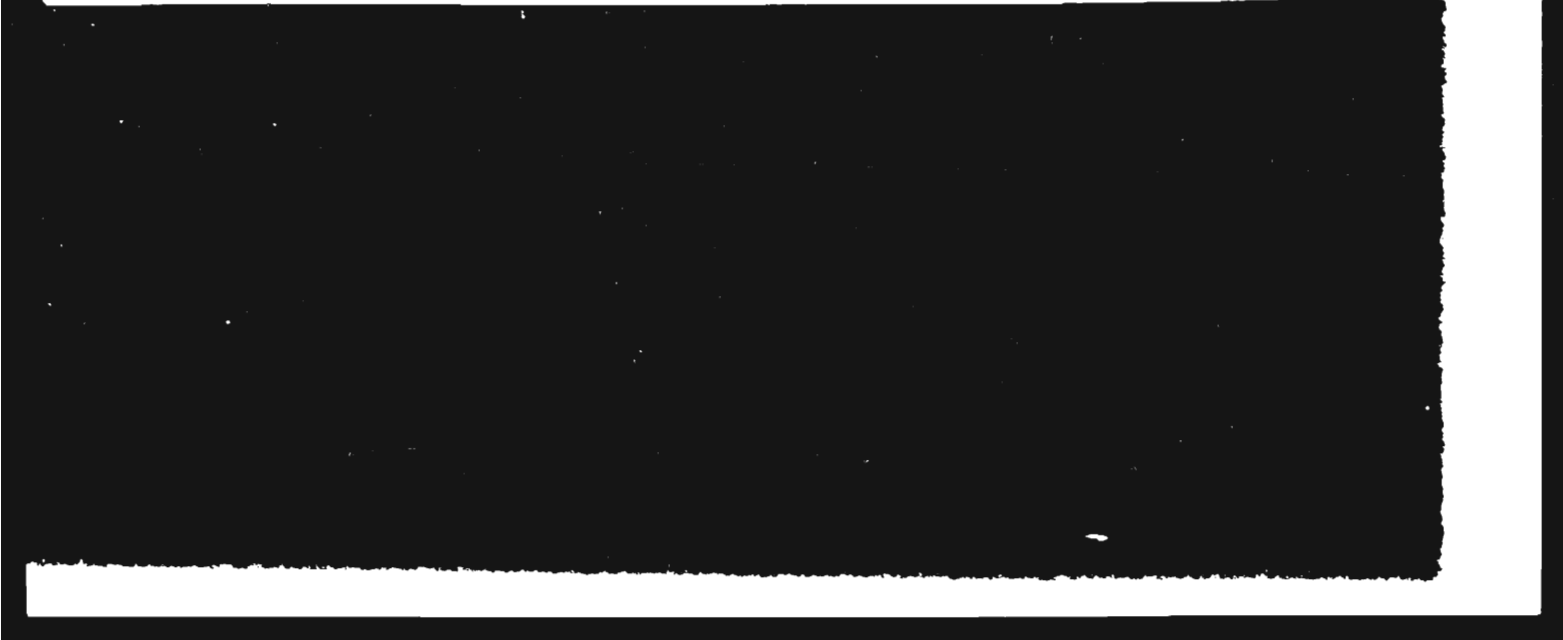
NAME OF COMMITTEE (In Full)

Free State Victory '88

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
William Wurzberger 922 Tyson St. Baltimore, MD 21201	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 3,500.
Michael Burgess 815 S. Hanover St. Baltimore, MD 21230	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 500.
Charles Howe 1181 Cleveland St. Baltimore MD 21230	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 200.
Swanson Typesetting 5208 York Road Baltimore, MD	printing Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 320.08
Nancy Jones 4 Danube Court Reisterstown, MD 21136	pre-election day distribution of literature Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	11/3/88	$ 5,600.
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
			$ 10,120.08
			$ 64,284.63




BALTIMORE MD
DEC
20
CERTIFIED
P 862 075 321
MAIL



RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 FEB -2 AM 9:59

1/31/89

This amendment relects the correction of a $5.00 addition mistake in the disbursements.

LInda Bowler Pierson

9 9 0 2 4 3 0 3 8 1 3 1 0 7 4 4 2

Name of Committee (in full)
Free State Victory '88

Address (number and street)
2516 N. Charles Street

City, State and ZIP Code
Baltimore, Maryland 21218

FEC Identification Number
C00292280

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:
- ☐ February 20 ☐ June 20 ☐ October 20
- ☐ March 20 ☐ July 20 ☐ November 20
- ☐ April 20 ☐ August 20 ☐ December 4
- ☐ May 20 ☐ September 20 ☐ January 31

- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on 11/8/88 in the State of Maryland

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY

		COLUMN A Total Period	COLUMN B Calendar Year-to-Date
5	Covering Period 10/20/88 through 11/28/88		
6	(a) Cash on Hand January 1, 19 89		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 1,503.75	
	(c) Total Receipts (from Line 18)	$ 67,190	$ 69,698
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 68,693.75	$ 69,698
7	Total Disbursements (from Line 28)	$ 65,954.90	$ 66,959.15
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,738.85	$ 2,738.85
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202 376-3120

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

Type or Print Name of Treasurer
Linda Bowler Pierson

Signature of Treasurer
Linda B. Pierson

Date
12/31/88

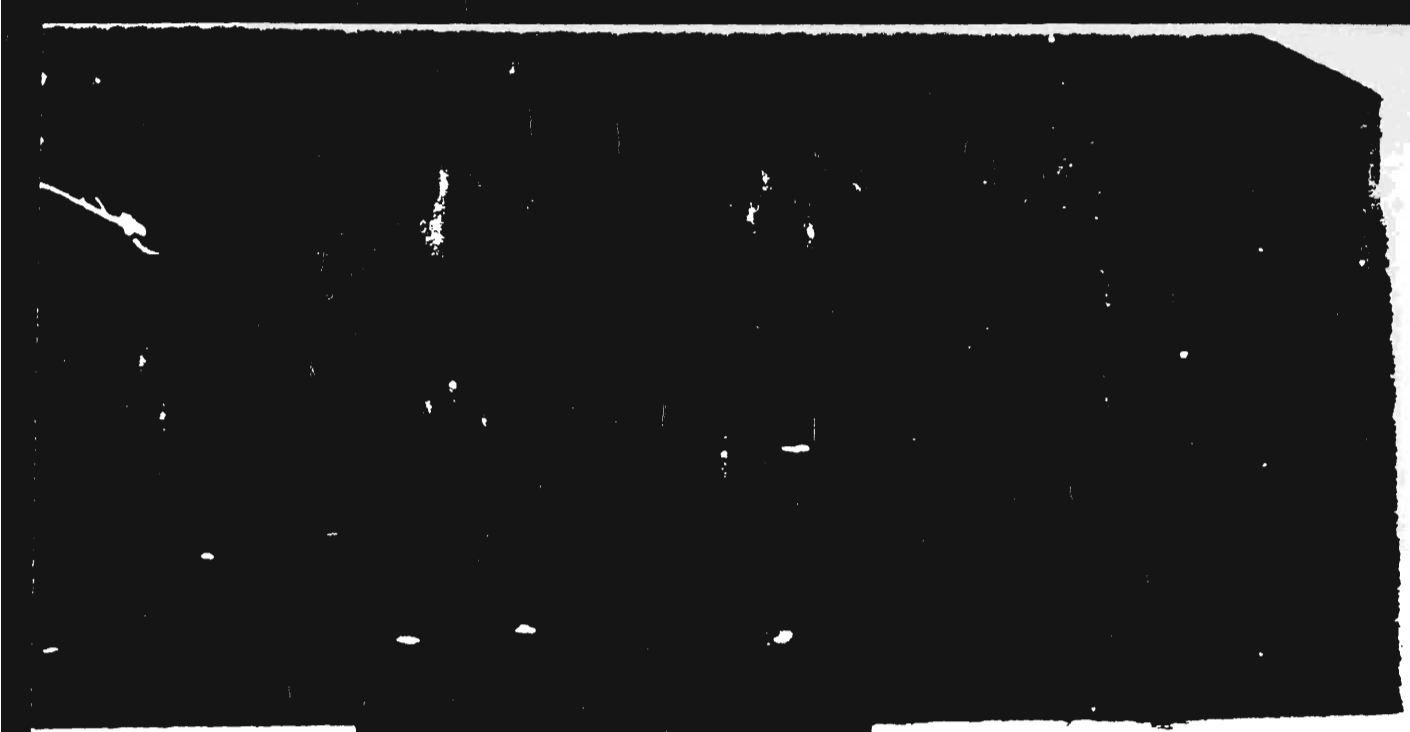
NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

FEC FORM 3X (revised 4/87)

Name of Committee (in full)
Free State Victory '98

I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	47,000	
(ii) Unitemized	4,190	
(iii) Total of contributions from individuals	52,190	
(b) Political Party Committees	0	
(c) Other Political Committees (such as PACs)	0	
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	52,190	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	15,000	15,000
13. ALL LOANS RECEIVED	0	0
14. LOAN REPAYMENTS RECEIVED	0	0
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	67,190	69,698
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	64,954.90	65,959.15
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,000	1,000
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	0	0
24. LOAN REPAYMENTS MADE	0	0
25. LOANS MADE	0	0
26. REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0
27. OTHER DISBURSEMENTS	0	0
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	65,954.90	66,959.15
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	52,190	54,698
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	52,190	54,698
32. TOTAL OPERATING EXPENDITURES (from Line 19)	64,954.90	65,959.15
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	64,954.90	65,959.15

8030274



CERTIFIED

P 340 034 087

MAIL



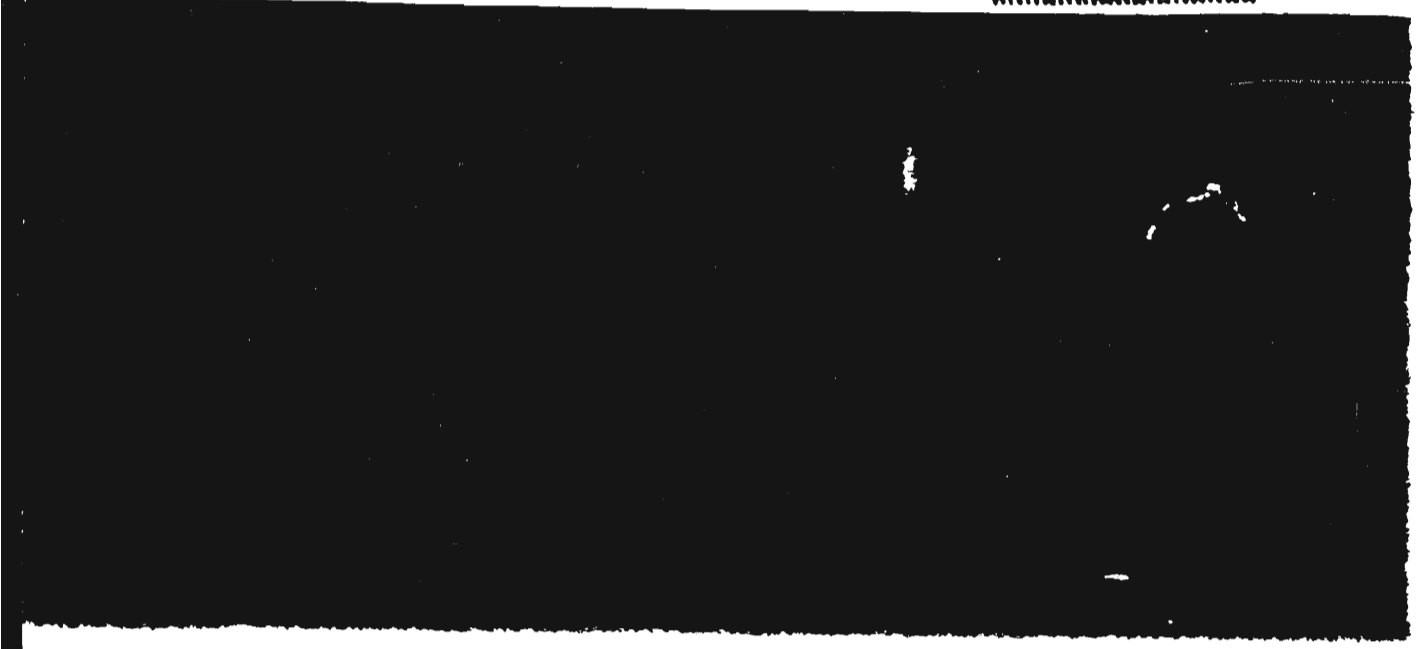
ALWAYS USE ZIP CODE

tate Victory '88
Charles Street
ore, Md. 21218

8903507

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

89 FEB -2 AM 11:59



1. Name of Committee (in full)
Free State Victory '88

Address (number and street)
2516 N. Charles Street

City, State and ZIP Code
Baltimore, Maryland 21218

C 00 322 50

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☒ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:
- ☐ February 20 ☐ June 20 ☐ October 20
- ☐ March 20 ☐ July 20 ☐ November 20
- ☐ April 20 ☐ August 20 ☐ December 4
- ☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Twelfth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

8 2 0 3 5 8 3 0 7 1 6 1 7 9 8

5. SUMMARY

(c) Covering Period 11/29/88 through 12/31/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 88		$ 0
	(b) Cash on Hand at Beginning of Reporting Period	$ 2,738.85	
	(c) Total Receipts (from Line 18)	$ 425.00	$ 70,123.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,163.85	$ 70,123.00
7	Total Disbursements (from Line 28)	$ 1,212.06	$ 68,171.21
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1,951.79	$ 1,951.79
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202 376 3120

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

Type or Print Name of Treasurer
Linda B Pierson

Signature of Treasurer
Linda B Pierson

Date
1/31/89

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

FEC FORM 3X
(revised 4 87)

DETAILED SUMMARY PAGE

Name of Committee (in full)		
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	425	62,610
(ii) Unitemized	175	7,513
(iii) Total of contributions from individuals		55,123
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	425	55,123
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	15,000
13. ALL LOANS RECEIVED	0	0
14. LOAN REPAYMENTS RECEIVED	0	0
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	425	70,123.
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	1212.06	67,121.21
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	1,000
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	0	0
24. LOAN REPAYMENTS MADE	0	0
25. LOANS MADE	0	0
26. REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0
27. OTHER DISBURSEMENTS	0	0
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1212.06	68,171.21
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	425	55,123.
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	425	55,123.
32. TOTAL OPERATING EXPENDITURES (from Line 19)	1212.06	67,121.21
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	1212.06	67,121.21

Itemized Receipts

State Victory '88

A. Full Name, Mailing Address and ZIP Code Dennis M. Devaney 7526 Yellow Bonnet Pl Columbia, MD 21046 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > $ 250.00	Date (month, day, year) 10/28/88	Amount of Each Receipt this Period 250.00
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)			250.00
TOTAL This Period (last page this line number only)			250.00

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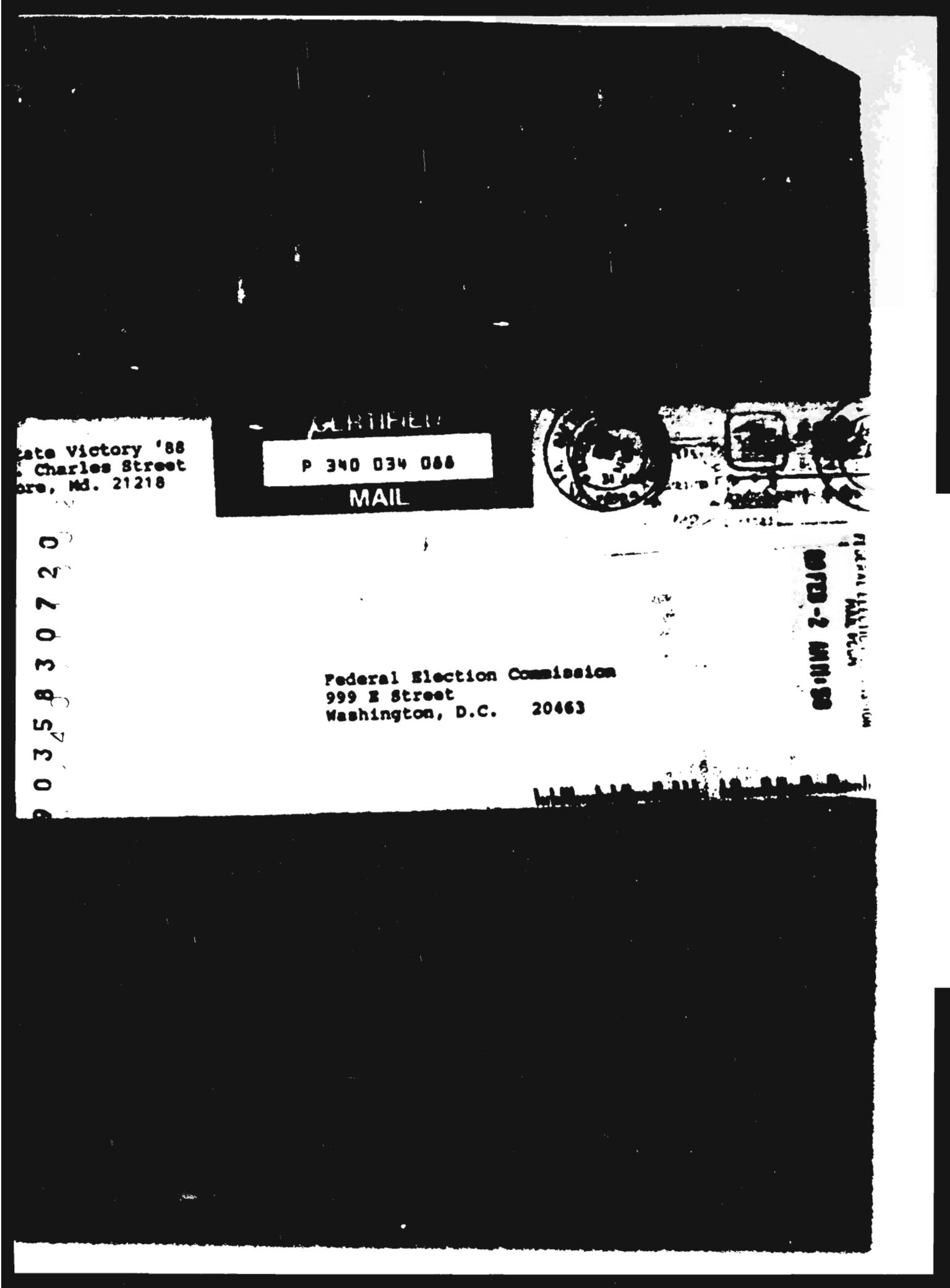
SCHEDULE B — ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person, except that using the name and address of any political committee to solicit contributions to such committee

NAME OF COMMITTEE (In Full)

Free State Victory '88

A. Full Name, Mailing Address and ZIP Code The Bun Penny 201 Light Street Baltimore, MD 21202	Purpose of Disbursement catering services Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 12/6/88	Amount of Each Disbursement This Period 246.45
B. Full Name, Mailing Address and ZIP Code Wirth - Strahler & Son. 427 E. 26th St. Baltimore, MD 21218	Purpose of Disbursement printing Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 12/21/88	Amount of Each Disbursement This Period 708.45
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			954.90
TOTAL This Period (last page this line number only)			954.90


CERTIFIED
P 340 034 088
MAIL
ate Victory '88
Charles Street
ore, Md. 21218
Federal Election Commission
999 E Street
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-2

25

Linda Bowles Pierson, Treasurer
Free State Victory '88
2516 North Charles Street
Baltimore, MD 21218

Identification Number: C00232280

Reference: 30 Day Post-General Report (10/20/88-11/28/88)

Dear Ms. Pierson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Each committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the amount of funds expended on federal and non-federal elections or on another reasonable basis. Administrative expenses are those day-to-day costs of operating the committee, including rent, utilities, salaries and other miscellaneous office expenses. The federal account of the committee must pay its share of such expenses. 11 CFR 106.1(e) and 102.5(a)(1)(i).

If your organization has incurred such administrative costs and your non-federal account has paid for all such costs, your federal account must reimburse the non-federal account for its portion of the expenses. The amount incurred by the federal account should be disclosed as a debt or obligation owed to the non-federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-The identification of each contributor, including the person's occupation and name of employer, must be

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provided if the person has contributed in excess of $200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation, name of employer and mailing address.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." Under 11 CFR 104.7(b), such effort shall consist of a clear request for the information (i.e., name, mailing address, occupation, and name of employer) which request informs the contributor that the reporting of such information is required by law. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR 104.3(a)(4)(i)

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contribution. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule B of the enclosed portion of your report discloses $53,550 for "Pre-Election Disbursement of Literature." Please be advised that a state or local party committee may pay for campaign materials (such as bumper stickers) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election. The payments are not considered contributions or expenditures as long as no public political advertising is used, including the distribution of materials by direct mail. 11 CFR 100.7(b)(15) and 100.8(b)(16). Please provide further information regarding the aforementioned disbursement(s).

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(D).

-Please provide a Schedule B to support the entry reported on Line 21 of the Detailed Summary Page. Each contribution made to a Federal candidate or committee must be itemized on Schedule B, regardless of the amount contributed. 11 CFR 104.3(b)(3)(v).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Todd S. Hageman

Todd S. Hageman
Reports Analyst
Reports Analysis Division

9004081805

.LE B ITEMIZED DISBURSEMENTS

NAME OF COMMITTEE (In Full)
Free State Victory '88

William Wurzberger 922 Tyson St. Baltimore, MD 21201	pre-election day distribution of literature	11/8/88	$ 3,500.
Michael Burgess 1815 S. Hanover St. Baltimore, MD 21230	pre-election day distribution of literature	11/8/88	$ 500.
Charles Howe 1181 Cleveland St. Baltimore MD 21230	pre-election day distribution of literature	11/8/88	$ 200.
Swanson Typesetting 5208 York Road Baltimore, MD	printing	11/8/88	$ 320.08
Nancy Jones 4 Danube Court Reisterstown, MD 21136	pre-election day distribution of literature	11/8/88	$5,000.
			$10,120 08
			$64,287.63

REG ITEMIZED DISBURSEMENTS

Free State Victory '88

Marie A. Rogers 635 Umber St. Baltimore, MD 21224	pre-election day distribution of literature X	11/8/88	$ 4,000.
Trenton Democratic Club 5803 Kay Ave Baltimore, MD 21205	pre-election day distribution of literature X	11/4/88	$ 1,000.
James Whitten 221 Cresswell Ave Brooklyn Pk., MD 21225	pre-election day distribution of literature X	11/8/88	$ 3,200.
Miche Foster Company 1801 Byrd Street Baltimore, MD 21230	printing posters X	11/2/88	$ 592.
John Luther 97 Greenhill Road Baltimore MD 21227	pre-election day distribution of literature X	11/8/88	$ 4,000.
United Northeast Democrats P.O. Box 3187 Baltimore, MD 21214	pre-election day distribution of literature X	11/8/88	$ 2,000.
[illegible] Decca 20[illegible] Fagley St Baltimore MD 21224	pre-election day distribution of literature X	11/8/88	$ 5,000.
[illegible] 305 E Highfield Rd Baltimore, MD 21212	pre-election day distribution of literature X	11/8/88	$ 5,000.
[illegible] Fogarty [illegible] Southerly Rd [illegible] MD 21[illegible]	pre-election day distribution of literature X	11/8/88	$ 5,000.
			$ 33,792.

SCHEDULE B — ITEMIZED DISBURSEMENTS

Free State Victory '88

Robert Dietz 2183 maryland Ave Baltimore MD 21218	Consulting	10/25/88 10/28/88 11/2/88	$ 500. $ 500. $ 500.
continued		11/14/88	$ 500.
Ruthanne Bary One Bajan Court Millersville, MD 21108	reimbursement for postage	10/24/88	$ 201.00
Swanson Typesetting 6205 York Road Baltimore MD	printing	10/21/88	$ 2,032.00
C+H Caterers 2345 Warren St. Silver Spring, MD 20910	catering for fund-raiser	11/2/88	$ 771.75
Circular Advertising 1500 S. monroe St. Baltimore MD	printing ballots	11/6/88	$ 3600.
Wirth-Strachler + Son Inc. 427 East 26th Street Baltimore, MD 21218	printing ballots	11/4/88	$ 1,001.60
United Northern Democrats	pre-election day distribution of literature	11/8/88	$ 6,500.
Independent Democratic Club 13 Warren Park Dr. Baltimore MD 21208	pre-election day distribution of literature	11/8/88	$ 4,000.
SUBTOTAL			$ 20,367.55
TOTAL			

SCHEDULE A — ITEMIZED RECEIPTS

NAME OF COMMITTEE (In Full)
Free State Victory '88

A. Sheldon M. Gordon 11611 San Vicente Blvd. Los Angeles, CA 90049 Receipt For: ☐ Primary ☒ General	Name of Employer Occupation Surgeon	4/1/88	$5,000.
B. Chanceland Farms II Receipt For: ☐ Primary ☐ General	Name of Employer Occupation	4/1/88	$1,000.
C. United Government Services Amalgamated Travel Receipt For: ☐ Primary ☐ General	Name of Employer Occupation	4/14/88	$1,000.
D. David A. Metzner 1226 Michigan Ct. Arlington, VA 22314 Receipt For: ☐ Primary ☐ General	Name of Employer Occupation	4/22/88	$500.
E. Receipt For: ☐ Primary ☐ General	Name of Employer Occupation		
F. Receipt For: ☐ Primary ☐ General	Name of Employer Occupation		
G. Receipt For: ☐ Primary ☐ General	Name of Employer Occupation		

TOTAL of Receipts This Page (optional) $7,500.

TOTAL To Date (for calendar year) $48,000

RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 16, 1989

Linda Bowler Pierson, Treasurer
Free State Victory '88
2516 North Charles Street
Baltimore, MD 21218

Identification Number: C00232280

Reference: 30 Day Post-General Report (10/20/88-11/28/88)

Dear Ms. Pierson:

On January 25, 1989 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated February 8, 1989 that requests additional time and notes the refund of a $1,000 contribution. Please be advised that if the information requested by the Commission is not received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Todd S. Hageman on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

FEDERAL ELECTION COMMISSION

89 FEB 13 AM 10:38

FREE STATE VICTORY '88
2516 North Charles Street
Baltimore, Maryland 21218

February 8, 1989

Federal Election Commission

Washington, D.C. 20463

Attn: Todd S. Hageman
Reports Analyst

Re: 30 Day Post-General Report
(10/20/88-11/28/88)
Identification # C00232280

Dear Mr. Hageman:

In response to your communication of January 25, 1989, Free State Victory '88 is preparing a response to your inquiries. Some of the information requires additional time to put together.

Therefore, please take this as our request for an extension of time to respond until Tuesday, February 22, 1989.

As an interim response, we have been able to determine that United Government Servies Amalgamated Travel is a corporation and have returned the $1,000 contribution. You will find attaced a photocopy of the refund check.

Chanceland Farms is not a corporation and it is our understanding that the contribution meets all legal tests.

Yours,

Linda Bowler Pierson
Treasurer
Free State Victory '88

2004081311

FREE STATE VICTORY 88
2518 N CHARLES ST
BALTIMORE MARYLAND 21218

125

Feb. 8 ,,89 7-90/550

PAY TO THE ORDER OF United Government Services Amalgamated $ 1,000.00
Travel

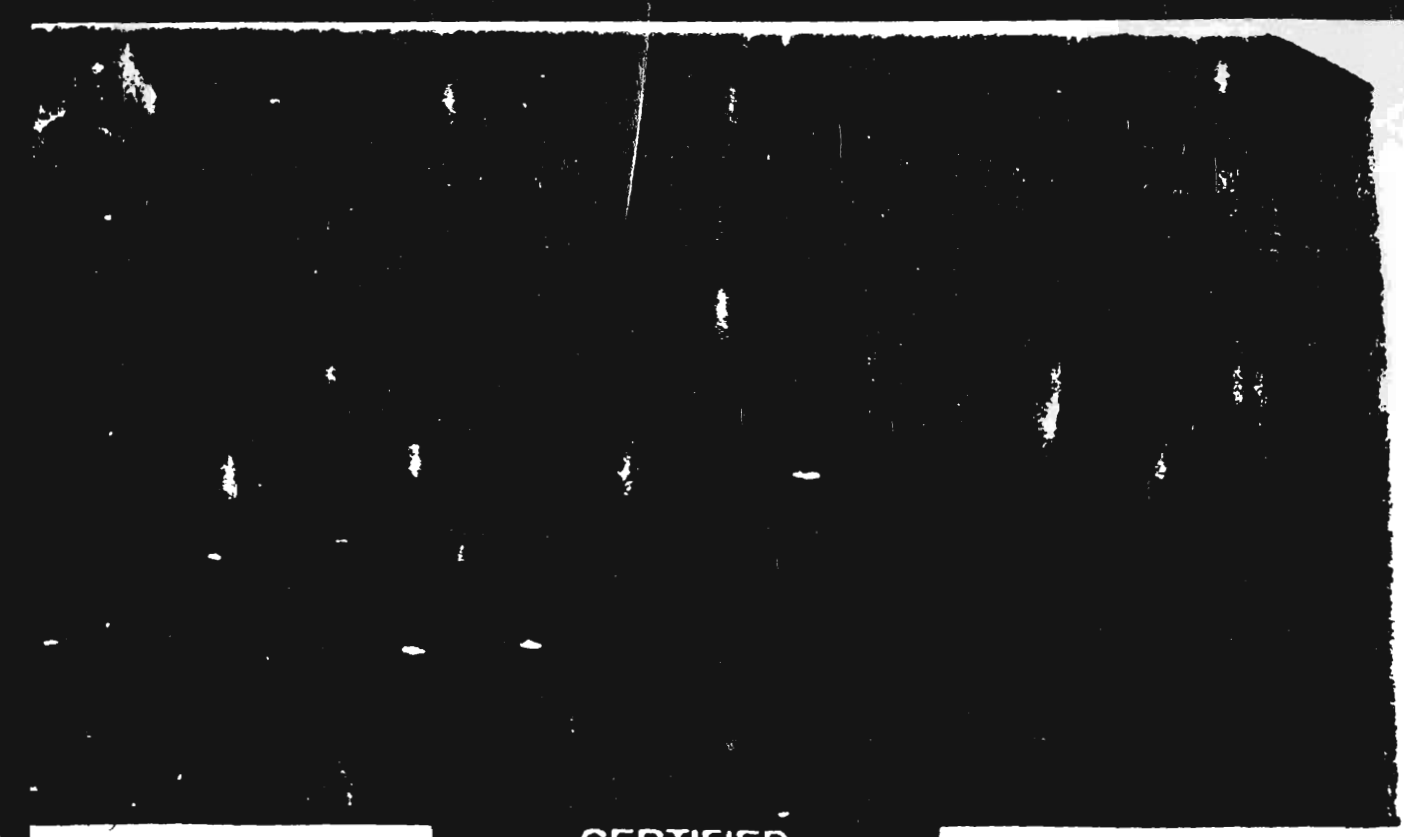
One Thousand and 00/100 - - - - - - - - - - - - - - - - DOLLARS

SOUTH AVENUE OFFICE
MARYLAND NATIONAL BANK
BALTIMORE MARYLAND 21203

MEMO refund of contribution

:052000168: 0125 000 787396

2004081812

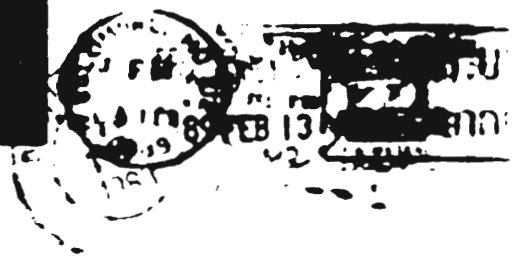


E STATE VICTORY '88
6 North Charles Street
timore, Md. 21218

CERTIFIED

P 870 223 473

MAIL



Mr. Todd S. Hageman
Reports Analyst
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463



pty

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 FEB 27 AM 11:02

February 22, 1989

Federal Election Commission
Washington, D.C. 20463

Attn: Mr. Todd S. Hageman
Reports Analyst

Re: 12 Day Pre-General Report
10/1/88-10/19/88)
30 Day Post-General Report
10/20/88-11/28/88
Identification # C00232280

Dear Mr. Hageman:

In response to your letters dated January 25, 1989 and January 27, 1989, Free State Victory offers the following information:

Our report discloses limited payments for administrative expenses because Free State Victory '88 incurred minimal expenses. The work of this committee was done in the kitchen of my home and all work was done by volunteers. There were no rent or salary expenses incurred.

Attached to this letter is an amended Schedule A for the 30 Day Post-General Report which reflects the addition of address, occupation and employer for certain contributors. Also attached is a copy of a letter I sent to each contributor for which the required information was not reported.

My letter to you dated February 8. 1989 discussed the corporate contribution received by us and its return. A photocopy of the check was attached to that letter.

Your letter further inquires about certain of the entries on Schedule B of our report. Free State Victory '88 arranged for the pre-election preparation and distribution of sample ballots throughout Baltimore City. Toward this end, Free State Victory '88 arranged to have nearly a half million sample ballots printed, and arranged for volunteers in various political clubs to deliver by hand the sample ballots

during the week preceding the election. A copy of one of the sample ballots is enclosed.

Attached to this letter is a Schedule A to support the entry on Line 12 of the Detailed Summary Page.

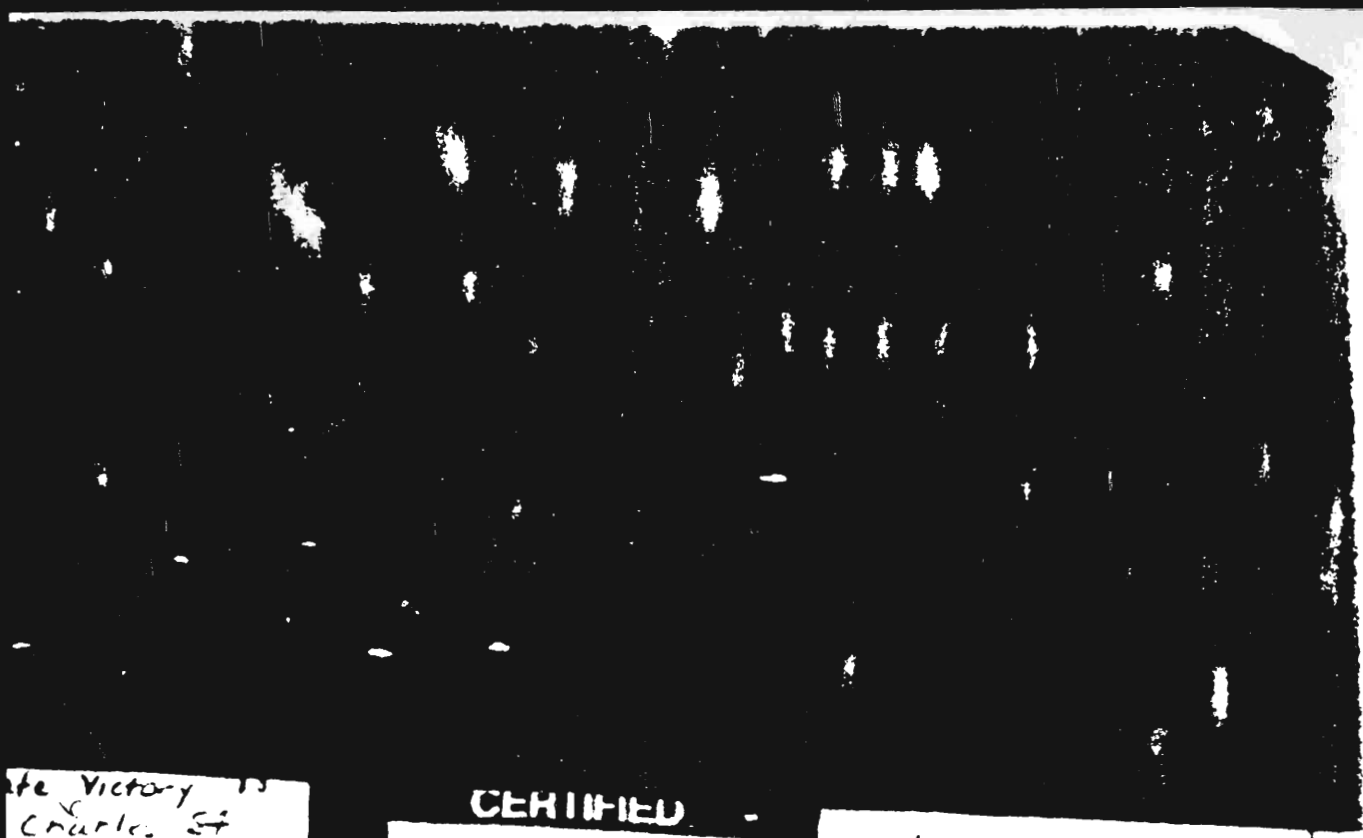
Attached to this letter is a Schedule B to support the entry reported on Line 21 of the Detailed Summary Page.

Sincerely,

Linda B. Pierson

Linda B. Pierson
Treasurer

● 20358620422
20040611815



te Victory
Charles St

CERTIFIED

P 240 034 468

MAIL

Federal Election Commission
Washington, D.C. 20463

Attn: Mr Todd Hagman
Report Analyst

MENDED
CHEDULE A

ITEMIZED RECEIPTS

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

PAGE

FOR LINE NUMBER: 11(a)(i)

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)

Free State Victory '88

A. Full Name, Mailing Address and ZIP Code Coenrad H.C. Everhard 9 Wilkins Court Tiburon, CA 94920	Name of Employer OOLL(USA) Inc.	Date (month, day, year) 10/21/88	Amount of Each Receipt this Period $5,000
Receipt For: ___ Primary X General ___ Other (specify)	Occupation Chairman, Steamship Line		
	Aggregate Year-to-Date $ 5,000		
B. Full Name, Mailing Address and ZIP Code Julia Lee Rubin 9021 Brickyard Road Potomac, MD 20854	Name of Employer NONE	Date (month, day, year) 11/2/88	Amount of Each Receipt this Period $5,000
Receipt For: ___ Primary X General ___ Other (specify)	Occupation Housewife		
	Aggregate Year-to-Date $ 5,000		
C. Full Name, Mailing Address and ZIP Code Sheldon M. Gordon Suite 515, 11611 San Vicente Bd. Los Angeles, CA 90049	Name of Employer The Gordon Company	Date (month, day, year) 11/7/88	Amount of Each Receipt this Period $5,000
Receipt For: ___ Primary X General ___ Other (specify)	Occupation Real Estate Developer		
	Aggregate Year-to-Date $ 5,000		
D. Full Name, Mailing Address and ZIP Code Chanceland Farms II P.O. Box 1037 Laurel, MD 20707	Name of Employer	Date (month, day, year) 11/1/88	Amount of Each Receipt this Period $1,000
Receipt For: ___ Primary X General ___ Other (specify)	Occupation		
	Aggregate Year-to-Date $ 1,000		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify)	Occupation		
	Aggregate Year-to-Date $		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify)	Occupation		
	Aggregate Year-to-Date $		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ___ Primary ___ General ___ Other (specify)	Occupation		
	Aggregate Year-to-Date $		

SUBTOTAL of Receipts this Page (optional)

TOTAL This Period (last page only)

pf

FREE STATE VICTORY '88

2516 N. Charles Street
Baltimore, Maryland 21218

Thank you for your recent contribution to the Free State Victory '88 Fund. Your support was most valuable.

The Federal Election Commission requires that our Committee file reports concerning our receipts and expenditures. Among the types of information required are the occupation and name of employer for all major contributors.

At your earliest convenience, please complete the information below and return it to me in the enclosed envelope.

Thank you for your cooperation in this matter.

Very truly yours,

Linda Bowler Pierson
Treasurer
Free State Victory '88

Name _____

Occupation _____

Name of Employer _____

8203586204581

SCHEDULE A — ITEMIZED RECEIPTS

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

PAGE 1 OF

FOR LINE NUMBER 12

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)

Free State Victory '88

A. Full Name, Mailing Address and ZIP Code Republican National Committee 310 First Street, S.E. Washington, D.C. 20003	Name of Employer Occupation Aggregate Year to Date > $	Date (month, day, year) 10/26/88	Amount of Each Receipt this Period $15,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify)			
B. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
C. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
D. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
E. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
F. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			
G. 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
Receipt For: ☐ Primary ☐ General ☐ Other (specify)			

SUBTOTAL of Receipts This Page (optional) $15,000.00

TOTAL This Period (last page this line number only)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE OF

FOR LINE NUMBER 21

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 which contributions from such committee.

NAME OF COMMITTEE (In Full)

Free State Victory '88

	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A	Bentley Re-Elect 2327 York Road Timonium, MD 21093	Contribution Disbursement for ☐ Primary ☐ General ☐ Other (specify)	11/7/88	$1,000.00
B		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I		Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL $1,000.00

TOTAL

Democrats For Bush

GEORGE BUSH	For President	1-B
ALAN L KEYES	For U.S. Senate	2-B
ROSS Z PIERPONT	For U.S. Congress	3-B

Paid For By
Texas Statewide Victory '88' Fund

9004031138211

Democrats For Bush

BUSH — For President — 1-[illegible]

ALAN L. KEYES — For U.S. Senate — 2-[illegible]

ROSS Z. PIERPONT — For U.S. Congress — 3-[illegible]

Paid For By
Friends Bush Victory '88 [illegible]

8 9 0 3 5 0 8 2 0 4 8
9 0 0 4 0 3 1 1 3 2 2

ate Victory II
. Charles St.
nove, MD 21218

CERTIFIED
P 340 034 468
MAIL



Federal Election Commission
Washington, D.C. 20463

Attn. Mr. Tidd Hagman
Report Analyst

89FEB27 AM11:32

C00403113823

FEC Form 3X Substitute Sheet

The following committee has filed a Report of Receipts and Expenditures covering more than one reporting period:

Amendment Indicator: A

Committee Name: PEEF STATE [illegible]TORY '88

Identification Number: C00273268

Report Type: 12P

Coverage Dates: 1[illegible]1988 To 10/15/88

Date of Report: 10/22/1988

Purpose of the Report for: AMENDED FEC REPORT

[illegible] Information: 86[illegible]7584204

8[illegible]4;0863514724

Howard County Victory '88

Baltimore County Victory '88

>0040811825

2004081118 26

REPORT OF RECEIPTS AND DISBURSEMENTS

FEC ID NUMBER: C00227736

Howard County Victory '18

7173 Winter Rose Path

CITY, STATE and ZIP CODE: Columbia, MD 21045

4. TYPE OF REPORT

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☒ Termination Report

Monthly Report Due On:
- ☐ February 20
- ☐ March 20
- ☐ April 20
- ☐ May 20
- ☐ June 20
- ☐ July 20
- ☐ August 20
- ☐ September 20
- ☐ October 20
- ☐ November 20
- ☐ December 20
- ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

Covering Period 1/1/09 through 1/31/09

		COLUMN A Total Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 09		$ 108.39
	(b) Cash on Hand at Beginning of Reporting Period	$ 108.39	
	(c) Total Receipts (from Line 18)	$ 7.00	$ 7.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 115.39	$ 115.39
7.	Total Disbursements (from Line 28)	$ 115.39	$ 115.39
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 0	$ 0
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ 0	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer: DENNIS R. SCHRADER

Signature of Treasurer: Dennis R Schrader

Date: 2/5/09

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

FEC FORM 3X (revised 4/87)

12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	
13 ALL LOANS RECEIVED	0	
14 LOAN REPAYMENTS RECEIVED	0	0
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, rebates, etc.)	0	0
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17 OTHER RECEIPTS (Dividends, interest, etc.)	0	0
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	7	7
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	22.89	22.89
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	92.50	92.50
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
22 INDEPENDENT EXPENDITURES (use Schedule E)	0	0
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	0	0
24 LOAN REPAYMENTS MADE	0	0
25 LOANS MADE	0	0
26 REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0
27 OTHER DISBURSEMENTS	0	0
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	115.39	115.39
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	7	7
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	7	7
32 TOTAL OPERATING EXPENDITURES (from Line 19)	22.89	22.89
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	22.89	22.89

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

83 FEB -7 PM 10:30

[illegible]

[illegible]

[illegible]

Baltimore County Rotary
[illegible] J. Neuman
[illegible] Thorncliff Road
Baltimore, Maryland 21239

C 00232637

January 22, 1989

Re: Change in Filing Frequency

Federal Election Commission
[illegible] E. Street
Washington, D.C. 20463

Dear Commissioners:

I am planning to change my filing frequency to semiannual reports.

Sincerely,

Marjorie J. Neuman

Marjorie J. Neuman, Treasurer

[illegible]

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

89 JAN 24 AM 10:56

REPORT OF RECEIPTS AND DISBURSEMENTS

For the ... Committee (Party, Non-Party)

FEDERAL ELECTION COMMISSION

[redacted] 88 JAN 25 PM 12:13

[redacted] C 00132637

MARJORIE J NEUMAN
[redacted] NORTHCLIFF ROAD
BALTIMORE MD 21230

4. TYPE OF REPORT

(a)
- [ ] April 15 Quarterly Report
- [ ] July 15 Quarterly Report
- [ ] October 15 Quarterly Report
- [X] January 31 Year End Report
- [ ] July 31 Mid Year Report (Non-election Year Only)
- [ ] Termination Report

Monthly Report Due On:

[ ] February 20	[ ] June 20	[ ] October 20
[ ] March 20	[ ] July 20	[ ] November 20
[ ] April 20	[ ] August 20	[ ] December 20
[ ] May 20	[ ] September 20	[ ] January 31

[ ] 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 _____

(b) Is this Report an Amendment? [ ] YES [X] NO

SUMMARY

5 Covering Period 11/29/88 through 12/31/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 88	[redacted]	$ -0-
	(b) Cash on Hand at Beginning of Reporting Period	$ 895.95	[redacted]
	(c) Total Receipts (from Line 18)	$ -0-	$ 4186.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 895.95	$ 4186.00
7	Total Disbursements (from Line 28)	$ 174.59	$ 3464.64
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 721.36	$ 721.36
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer MARJORIE J NEUMAN

Signature of Treasurer Marjorie J Neuman

Date 1/[illegible]/89

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

FEC FORM 3X

(revised 4/87)

o. Co. Victory '88
ome J. Newman
Thornell Road
o., Md. 21236

23 0 4 0 3 7 9 1 1 2 6 6 3 4

BALTIMORE MD
PM
24 JAN
1989

ZIP CODE

Federal Election Commission
999 E Street
Washington, DC 20463

FEDERAL ELECTION COMMISSION
89 JAN 25 PM 12:13

Baltimore County Victory '88

2323 York Road

Timonium, Maryland 21093

September 21, 1988

(a) This committee is a principal campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

(c) This committee supports/opposes only one candidate as _____ and is NOT an authorized committee.
(Name of candidate)

(d) This committee is a subordinate committee of the Republican Party.
(National, State or subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Maryland State Republican Party FF	60 West Street Annapolis, Maryland	Affiliate

Type of Connected Organization

☒ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Marjorie J. Neuman	2323 York Road Timonium, Md. 21093	Chairman

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Marjorie J. Neuman	2323 York Road	Treasurer
Barbara Chinn	401 Dixie Drive Towson Md 21204	Designated Agent

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Signet Bank	Timonium Office 2100 York Rd. Timonium, Maryland 21093

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Marjorie J. Neuman	Marjorie J. Neuman	9/25/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free: 800-424-9530
Local: 202-376-3120

FEC FORM 1
(revised 4/87)

J. Neuman
'88
Rd.
Md. 21093

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

93 SEP 28

[illegible]

[illegible]

[illegible]

November 14, 1988

Research Annalysis Division
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Please be advised of a change of address, effective November 16, 1988.

Name: S.C. Victory '88
FEC ID # : C00232637
New Address : c/o Neuman
4226 Thorncliff Road
Baltimore, Maryland 21236

Sincerely,

Marjorie Neuman

Marjorie Neuman,
Chairman, Baltimore County Victory '88

8803365119348

Maryland Victory '88

[illegible]
26 Thorncliff Road
[illegible], Md., 21236

Research Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

88 NOV 16 AM 9:31

[illegible]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

(Summary Page)

1. Name of Committee (in full)
BALTIMORE COUNTY VICTORY '88

Address (number and street)
4216 THORNCLIFF ROAD

City, State and ZIP Code
BALTIMORE MARYLAND 21236

2. Federal I.D. Number
C00232637

3. ☐ This committee qualifies as a multicandidate committee. Date Party Status Established

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☑ Thirtieth day report following the General Election on Nov. 8 1988 in the State of MARYLAND

(b) Is this Report an Amendment? ☐ YES ☑ NO

5. SUMMARY

Covering Period 10/1/88 through 12/5/88

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 88		$ -0-
	(b) Cash on Hand at Beginning of Reporting Period	$ 19450	
	(c) Total Receipts (from Line 18)	$ 10[illegible]	$ [illegible]
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B	$ [illegible]	$ [illegible]
7	Total Disbursements (from Line 28)	$ [illegible]	$ [illegible]
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ [illegible]	$ [illegible]
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
[illegible]

Signature of Treasurer
[illegible]

Date
[illegible]

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

FEC FORM 3X
(revised 4/87)

[illegible] RE COUNTY VICTORY '86	[illegible] 1/86	to 12/31/86
I. RECEIPTS		
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	3[illegible]5.00	[illegible]
(ii) Unitemized	[illegible]	2[illegible]96.00
(iii) Total of contributions from Individuals	2[illegible]5.00	[illegible]
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	2[illegible]5.00	[illegible]
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13 ALL LOANS RECEIVED	-0-	-0-
14 LOAN REPAYMENTS RECEIVED	-0-	-0-
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17 OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	2585.00	4186.00
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	2483.60	3955.55
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
22 INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	-0-	-0-
24 LOAN REPAYMENTS MADE	-0-	-0-
25 LOANS MADE	-0-	-0-
26 REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-
27 OTHER DISBURSEMENTS	-0-	240.00
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2483.60	[illegible]
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	[illegible]	[illegible]
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-
31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	[illegible]	[illegible]
32 TOTAL OPERATING EXPENDITURES (from Line 19)	[illegible]	[illegible]
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	[illegible]	[illegible]

SCHEDULE A — ITEMIZED RECEIPTS

NAME OF COMMITTEE (In Full)

BALTIMORE COUNTY VICTORY '88

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
FRANCIS P. LUCIER 11115 OLD YORK ROAD MONKTON, MARYLAND 21111	RETIRED Occupation: CHAIRMAN OF BOARD- BLACK & DECKER	10/7/88	500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date > $		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B — ITEMIZED DISBURSEMENTS

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

PAGE 1 / 1

FOR LINE NUMBER: 17

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)
BALTIMORE COUNTY VICTORY '88

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
US POST OFFICE	3000 13.2¢ STAMPS Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/24/88	396.00
B. Full Name, Mailing Address and ZIP Code U.S POST OFFICE	Purpose of Disbursement 3000 13.2¢ STAMPS Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10/25/88	Amount of Each Disbursement This Period 396.00
C. Full Name, Mailing Address and ZIP Code ATLANTIC CATERERS INC 4567 HARFORD RD BALTIMORE MD 21214	Purpose of Disbursement CATERING FOR FUND RAISER Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 11/12/88	Amount of Each Disbursement This Period 574.85
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			[illegible]

FOR CHRIS

FEDERAL ELECTION COMMISSION
[illegible]
WASHINGTON, D.C. 20463

89 DEC -6 AM 9:39

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89 OCT -5 PM 4:21

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee	)	
	)	
Rep. Helen Delich Bentley	)	MUR 2936
	)	
Richard P. Taylor	)	
	)	
Republican National Committee	)	
	)	
Gary W. Bauer	)	

GENERAL COUNSEL'S REPORT

I. Background

On August 14, 1989, the Commission made reason to believe findings in this matter with respect to the failure to forward to the proper committee and within the required 10-day period approximately $6,550 in contribution checks on which the payee line had been altered to include "CCRCCFA," the acronym for the Carroll County Republican Central Committee Federal Account ("Federal Account"). The Commission approved interrogatories and request for documents to Rep. Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee and to seven nonrespondent witnesses with regard to the handling of these contributions. The investigation regarding these contributions is proceeding.

II. Additional Apparent Failure to Forward

In the First General Counsel's Report, signed August 8, 1989, this Office noted at Footnote 4 on page 5 that the Carroll County Republican Central Committee Federal Account had transferred $5,000 to the Baltimore County Victory '88 in February 1989.

2940314

These funds apparently came from the contributions deposited into the Federal Account from fundraising by Richard Taylor and Rep. Bentley.

In further tracing the transfer of a portion of these funds to the Baltimore County Victory '88, this Office examined the 1989 Mid-Year Report for the committee filed on July 25, 1989. See Attachment 1. That report discloses total receipts of $11,083.72 for the period, including the $5,000 transfer from the Federal Account on February 9, 1989. The report also disclosed a $5,000 contribution reported as received on January 5, 1989, from the Northwest National Political Action Committee in Fayetteville, Arkansas.

The Northwest National Political Action Committee is registered with the Commission as the Northwest National Bank Political Action Committee and is the separate segregated fund of the Northwest National Bank of Fayetteville, Arkansas. In seeking to locate the reporting of the $5,000 contribution, this Office examined the PAC's reports for 1988 and 1989. The 1989 Mid-Year Report and the 1988 Year End Report disclosed no disbursements. Its 1988 Post General Election Report, however, disclosed $6,500 in disbursements (for total disbursements for all of 1988 of only $8,500). See Attachment 2. Among the disbursements was a $5,000 contribution reported as made on October 28, 1988, to "Victory '88 c/o Mr. James F. Keenan, Pace Industries, Inc., 217 Easy Street, Aiken, SC 29801." This is the only $5,000 reported by the PAC as made in 1988.

Thus, the $5,000 contribution Northwest National Bank PAC

3045318

reported making on October 28, 1988, to Victory '88 in care of Mr. Keenan can only be the same $5,000 reported as received by the Baltimore County Victory '88 on January 5, 1989. Approximately 69 days elapsed from when the contribution was reported as being made to when it was reported as being received. Furthermore, the PAC reported the contribution as being made to Victory '88, not to Baltimore County Victory '88.

As noted in the First General Counsel's Report, the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations provide that every person who receives a contribution in excess of $50 for an unauthorized committee shall forward that contribution to the treasurer within 10 days after receiving it along with the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b).

Therefore, the above information indicates that James F. Keenan may have failed to forward the $5,000 contribution from Northwest National Bank PAC to the proper committee and within the 10-day requirement of the Act and regulations. Accordingly, this Office recommends that the Commission find reason to believe James F. Keenan violated 2 U.S.C. § 432(b)(2). In addition to the proposed interrogatories and request for documents to Mr. Keenan, this Office also recommends that the Commission approve the proposed subpoenas to the Northwest National Bank PAC and the Baltimore County Victory '88 as nonrespondent witnesses.

III. RECOMMENDATIONS

1. Find reason to believe James F. Keenan violated 2 U.S.C. § 432(b)(2).

4036813

2. Approve the attached letter, factual and legal analysis, and interrogatories and request for documents to James F. Keenan.

3. Approve the attached letters and subpoenas to the Northwest National Bank Political Action Committee and Virginia T. Morris, as treasurer, and to the Baltimore County Victory '88 and Marjorie J. Neuman, as treasurer, as nonrespondent witnesses.

10/5/89
Date

Lawrence M. Noble
General Counsel

Attachments
1. Baltimore County Victory '88 Report
2. Northwest National Bank PAC Report
3. Proposed Letters(3), factual and legal analysis(1), interrogatories and request for documents (1), and subpoenas(2)

Staff persons: George F. Rishel
Jeffrey D. Long

3403147

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FEDERAL ELECTION COMMISSION
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

October 6, 1989

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2936
Carroll County Republican Central Committee Federal Account

The attached letter has been revised in accordance with the Commission's vote at the Executive Session on October 3, 1989.

The revised letter has reversed the order of the second and third paragraphs from the letter originally proposed by this Office. In addition, these two paragraphs have been further modified to state specifically that the waiver of confidentiality applies to only the Carroll County Republican Central Committee Federal Account and to the findings the Commission made with respect to this respondent and does not apply to any information relating to other respondents or issues.

This Office recommends that the Commission approve the attached letter.

RECOMMENDATION

1. Approve the attached letter.

Attachment
Proposed letter

Staff Persons: Jeffrey D. Long
George F. Rishel

2031348

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1989

Shaukat A. Ashai
11380 Heathertoe Lane
Columbia, MD 21044

Dear Mr. Ashai:

On August 22, 1989, the Federal Election Commission sent you a Interrogatory and Request to Produce Documents as a nonrespondent witness in a matter under investigation by the Commission. The Interrogatory and Request required your response within 15 days of receipt. A copy of this document is enclosed. The return receipt indicates you received the Interrogatory and Request on September 13, 1989.

To date, we have not received your response to the Interrogatory and Request. You should contact the Office of the General Counsel immediately. If your response to the Interrogatory and Request is not received within 10 days, this Office will consider recommending that the Commission issue a subpoena and order to enforce the Interrogatory and Request.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure

2040813349

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1989

Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, MD 20854

Dear Dr. Mohmood:

On August 22, 1989, the Federal Election Commission sent you a Interrogatory and Request to Produce Documents as a nonrespondent witness in a matter under investigation by the Commission. The Interrogatory and Request required your response within 15 days of receipt. A copy of this document is enclosed. The return receipt indicates you received the Interrogatory and Request on August 29, 1989.

To date, we have not received your response to the Interrogatory and Request. You should contact the Office of the General Counsel immediately. If your response to the Interrogatory and Request is not received within 10 days, this Office will consider recommending that the Commission issue a subpoena and order to enforce the Interrogatory and Request.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure

2004031850

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Tariq Mohmood, M.D.
10701 Balantre Lane
Potomac, MD 20854

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents an documents and materials which may otherwise be construed to out of their scope.

1. Provide all documents in your possession relating to your check number 326, dated October 11, 1988, made payable to "Victory '88 CCRCCFA" and drawn on your account.

2. State to whom and on what date you delivered or sent this check and the method of delivery or sending.

3. Describe in detail the circumstances leading up to and surrounding your making of the contribution represented by this check.

4. State the purpose for which you made this contribution and to what entity you understood you were making this contribution at the time you made it and describe the basis for such understanding.

5. State whether you have had any communication or discussions with any person(s), other than your immediate family or employees, regarding this contribution. If so, identify with whom and when you had each communication or discussion and describe the nature of each communication or discussion. Provide all documents in your possession relating to all such communications or discussions.

6. State whether or you wrote "CCRCCFA" on the "pay to the order of" line of the check identified in question 1. If you did not, identify who wrote this notation on the check.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1989

Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, MD 20866

Dear Dr. Shah:

On August 22, 1989, the Federal Election Commission sent you a Interrogatory and Request to Produce Documents as a nonrespondent witness in a matter under investigation by the Commission. The Interrogatory and Request required your response within 15 days of receipt. A copy of this document is enclosed.

To date, we have not received your response to the Interrogatory and Request. You should contact the Office of the General Counsel immediately. If your response to the Interrogatory and Request is not received within 10 days, this Office will consider recommending that the Commission issue a subpoena and order to enforce the Interrogatory and Request.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure

2004031835

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Parvez Shah, M.D.
4405 Dustin Road
Burtonsville, MD 20866

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from July 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. Provide all documents in your possession relating to your check number 1272, dated October 12, 1988, made payable to "Victory '88 CCRCCFA" and drawn on your account.

2. State to whom and on what date you delivered or sent this check and the method of delivery or sending.

3. Describe in detail the circumstances leading up to and surrounding your making of the contribution represented by this check.

4. State the purpose for which you made this contribution and to what entity you understood you were making this contribution at the time you made it and describe the basis for such understanding.

5. State whether you have had any communication or discussions with any person(s), other than your immediate family or employees, regarding this contribution. If so, identify with whom and when you had each communication or discussion and describe the nature of each communication or discussion. Provide all documents in your possession relating to all such communications or discussions.

6. State whether or you wrote "CCRCCFA" on the "pay to the order of" line of the check identified in question 1. If you did not, identify who wrote this notation on the check.

RECEIVED
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OFFICE OF GENERAL COUNSEL
89 OCT 16 PM 2:34

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MAIL ROOM
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#4270

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936

Response of **Tariq Mahmood, M.D.** to Interrogatories and Request for Production of Documents

1. I have attached the original of the cancelled check which I wrote to "Victory 88". It is the only document relating to said check # 326.

2. I wrote out and gave the check personally to a person whom I took to be a member of the staff of Mr. Keys at a luncheon in Baltimore to which I had been invited on October 11, 1989.

3. I was contacted by the office of Mr Keys and invited to the luncheon mentioned above, which I was told was being held to raise funds for Mr. Key's senatorial bid. I had only met Mr. Keys once before, at a luncheon sponsored by a Mrs. Gore. I was also told that President Reagan would be attending the lunch, and that the campaign comittee hoped I could donate $1,000. to the campaign fund. I indicated that I would. I went to the lunch, wrote out my check, had my picture taken with the President, and left thereafter

4. I believed that I was making a contribution to the campaign fund intended to be used to elect Mr. Keys to the vacant Senate seat in Maryland. I was told and believed that that campaign fund was entitled "Victory 88". I was told at the luncheon that the title of the campaign fund for Mr. Keys was "Victory 88", and that I should write out my check to "Victory 88".

5. I have not had any other conversations or communications with third parties concerning this matter.

6. I did not at any time write "CCRCCFA" on the check, nor do I know what it means. I have absolutely no idea of who put the letters "CCRCCFA" on the check, nor do I have any idea of when it might have been done, other than to say that it was not done by anyone whom I know. I did not authorize anyone at any time to put those letters, or any other letters, on the check. Lastly, I

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do not know or recognize the signature on the endorsement on the reverse of the check.

I state and swear that the above statements are true, accurate, and complete to the best of my knowledge and belief.

TARIQ MAHMOOD, M.D.

Date: Sept 20 89

SS: HOWARD COUNTY
~~Montgomery County~~, Maryland

I, Valerie D. McCuen, Notary Public in and for the State of Maryland, ~~Montgomery~~ HOWARD County, do hereby state and declare that the abovementioned Tariq Mahmood, M.D., did appear before me personally, and making himself known to me, did state and swear that the above statements and answers were true, complete, and accurate to the best of his knowledge and belief

Valerie D. McCuen
Notary Public

My commission expires.

Valerie D. McCuen
Notary Public, Prince George's County, MD
My Commission Expires July 1, 1990

2004031361

1. Provide all documents in your possession relating to your check number 326, dated October 11, 1988, made payable to "Victory '88 CCRCCFA" and drawn on your account.

2. State to whom and on what date you delivered or sent this check and the method of delivery or sending.

3. Describe in detail the circumstances leading up to and surrounding your making of the contribution represented by this check.

4. State the purpose for which you made this contribution and to what entity you understood you were making this contribution at the time you made it and describe the basis for such understanding.

5. State whether you have had any communication or discussions with any person(s), other than your immediate family or employees, regarding this contribution. If so, identify with whom and when you had each communication or discussion and describe the nature of each communication or discussion. Provide all documents in your possession relating to all such communications or discussions.

6. State whether or you wrote "CCRCCFA" on the "pay to the order of" line of the check identified in question 1. If you did not, identify who wrote this notation on the check.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee	)	
	)	
Rep. Helen Delich Bentley	)	MUR 2936
	)	
Richard P. Taylor	)	
	)	
Republican National Committee	)	
	)	
Gary W. Bauer	)	

2 0 4 0 3 5 3

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 17, 1989, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 2936:

1. Find reason to believe James F. Keenan violated 2 U.S.C. § 432(b)(2).

2. Approve the letter, factual and legal analysis, and interrogatories and request for documents to James F. Keenan as recommended in the General Counsel's report dated October 5, 1989.

(continued)

3. Approve the letters and subpoenas to the Northwest National Bank Political Action Committee and Virginia T. Morris, as treasurer, and to the Baltimore County Victory '88 and Marjorie J. Neuman, as treasurer, as nonrespondent witnesses, as recommended in the General Counsel's report dated October 5, 1989.

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

Attest:

Marjorie W. Emmons

Date: 10-17-89

Marjorie W. Emmons
Secretary of the Commission

2004031364

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter	)	
	)	MUR 2936
Carroll County Republican	)	
Central Committee Federal	)	
Account	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 18, 1989, the Commission decided by a vote of 5-0 to approve the letter attached to the General Counsel's October 6, 1989 report on the above-captioned matter.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision; Commissioner McGarry did not vote.

Attest:

Date: 10/18/89

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat October 6, 1989 at 4:20 p.m.
Circulated to the Commission October 10, 1989 at 11:00 a.m.
Deadline for vote: October 18, 1989 at 11:00 a.m.

2004031365

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1989

Louis E. Wiser, Jr., Treasurer
Carroll County Republican Central
Committee Federal Account
2810 Gillis Street
Mt. Airy, MD 21771

RE: MUR 2936
Carroll County Republican
Central Committee Federal
Account

Dear Mr. Wiser:

This is in response to your letter dated September 14, 1989, wherein the Carroll County Republican Central Committee Federal Account ("the Committee") waives its right to confidentiality in the above-captioned matter, pursuant to 2 U.S.C. § 437g(a)(12)(A).

The Committee's waiver is hereby acknowledged by the Federal Election Commission; however, please note that this waiver pertains to information concerning the Committee alone and relates to the findings regarding the Committee's recordkeeping, reporting, and deposit of certain contributions. It does not pertain to any other respondents or issues in this matter. Thus, you or the Committee may not disclose to any person any information pertaining to the other respondents or issues in this matter until you are notified by the Commission that the entire file in this matter is closed.

The Commission will consider requests for information concerning this matter as it relates to only the Committee and the findings with respect to the Committee subject to the following considerations. First, requests must be in writing. Second, such requests will be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in Sunshine Act, and all relevant privileges which limit or preclude the release of such requested information.

In your September 14, 1989, letter you also requested to enter into conciliation negotiations prior to a finding of probable cause to believe.

2040311356

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe. 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.

If you have any question, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

BEFORE THE FEDERAL ELECTION COMMISSION 89 OCT 26 AM 8:38

In the Matter of)
)
) MUR 2936
)

WITNESS'S FURTHER RESPONSE

DANIEL OLIVER, residing at 3105 Woodley Road, N.W., in the City of Washington, District of Columbia, being duly sworn deposes and says further to answers to interrogatories sworn to on September 7, 1989:

1. Attached is a copy of a letter dated October 31, 1988 from George Bush acknowledging my contribution to Victory '88; attached also is a copy of the front and back of the envelope in which the letter arrived.

2. I found the letter last Saturday, October 21, 1989 while cleaning out my desk at home.

3. I have no recollection of receiving or reading the letter prior to last Saturday -- but have no reason to suppose I did not do so some time after the date it was posted.

Daniel Oliver

City of Washington :
: SS
District of Columbia :

Subscribed and sworn to before me this 24th day of October, 1989.

Notary Public

My Commission Expires June 30, 1990

My Commission expires _____

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 OCT 26 PM 2:03

2 0 0 3 1 1 3 6 8

GEORGE BUSH

October 31, 1988

Mr. and Mrs. Daniel Oliver
3105 Woodley Drive
Washington, D. C. 20008

Dear Dan and Louise:

Thank you for your very generous contribution and for being a part of Victory '88 - D. C.. The funds you have provided will directly assist all Republicans running for federal office in D. C. and will help ensure we have the essential resources needed to win on November 8.

The Victory '88 program is vital to our Party's success and your support now ensures that critical campaign strategies and programs can be planned.

Again, thank you for your support. You have my deepest gratitude.

Sincerely,

George Bush

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

9 3 0 4 0 8 1 1 3 7 0

GEORGE BUSH





Mr. and Mrs. Daniel Oliver
3105 Woodley Drive
Washington, D. C. 20008

310 FIRST STREET, SOUTHEAST
WASHINGTON, D.C. 20003

9 0 0 4 0 8 1 1 3 7 1

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
RECEIVED
89 NOV -3 PM 3:15

Martha Ann Sitterding
ATTORNEY AT LAW

ONE COURT PLACE, P.O. BOX 2022
WESTMINSTER, MARYLAND 21157
301-876-6057 301-857-0738

OGC #4463

November 3, 1989

VIA FAX 202-376-5280

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
99 "E" Street, N.W.
Washington, D.C. 20463

Re: MUR 2936 - Sharon W. Hornberger

Dear Mr. Noble:

At the request of Robert A. Pascal, Secretary of Appointments for the State of Maryland, and in conjunction with the request of my client, Sharon W. Hornberger, who has affixed her signature below, I am herewith requesting that you release to the said Robert A. Pascal a full statement to him as to Mrs. Hornberger as a witness or respondent in the above-referenced investigation being conducted by your Commission or any other matter pending before your Commission at this time.

Secretary Pascal has requested this information be presented to him as soon as possible. Should there be any additional information you require or releases for your Commission to disclose the requested information to Secretary Pascal, if you would be so kind as to contact us immediately at the telephone number listed above, the information or releases shall be obtained forthwith.

Very truly yours,

MAS:bd

Martha Ann Sitterding
Counsel for Sharon W. Hornberger

Sharon W. Hornberger

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Virginia T. Morris, Treasurer
Northwest National Bank
Political Action Committee
3500 North College
Fayetteville, AR 72701

RE: MUR 2936

Dear Ms. Morris:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached order and subpoena which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information with 15 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

2940211373

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

2004011374

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Virginia T. Morris, Treasurer
Northwest National Bank
Political Action Committee
3500 North College
Fayetteville, AR 72701

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested in the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

2040311375

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this third, day of November, 1989.

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Request and Questions (3 pages)

2004031376

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from June 30, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

3 1 1 3 7 7

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

The following questions relate to a $5,000 contribution from the Northwest National Bank Political Action Committee that you reported as made on October 28, 1988, to Victory '88 in care of James F. Keenan, Pace Industries, Inc., Aiken, South Carolina.

1. State to whom the check for this contribution was made payable. Provide a copy of the front and back of the canceled check.

2. Identify the person(s) who requested or solicited this contribution and explain the reason and purpose for making this contribution. Provide copies of all writings or documents relating to the request or solicitation of this contribution.

3. State to whom the check for this contribution was sent, the method of sending, and the date it was sent. Provide copies of all writings or documents relating to the transmittal of this check.

4. Explain in detail how it came to pass that this contribution was eventually reported as being received by the Baltimore County Victory '88 with a date of January 5, 1989.

5. State whether you intended this contribution to be forwarded to the Baltimore County Victory '88 at the time you made the contribution and state whether any such intent was communicated to anyone. If so, identify the person(s) so informed.

6. Provide copies of all documents relating to your response to this subpoena.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James F. Keenan
Pace Industries, Inc.
217 Easy Street
Aiken, SC 29801

RE: MUR 2936
James F. Keenan

Dear Mr. Keenan:

On October 17 , 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your 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 you, 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

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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 ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

2040311331

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: James F. Keenan **MUR:** 2936

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that "[e]very person who receives a contribution for a political committee which is not an authorized committee shall...if the amount of the contribution is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contributions, no later than 10 days after receiving the contribution." 2 U.S.C. § 432(b)(2). See also, 11 C.F.R. § 102.8(b).

The Northwest National Bank Political Action Committee of Fayetteville, Arkansas, reported making a $5,000 on October 28, 1988, to Victory '88 in care of James F. Keenan, Pace Industries, Inc., 217 Easy Street, Aiken, SC 29801. This was the only $5,000 contribution reported as made by this Committee in 1988 and to date in 1989.

The Baltimore County Victory '88 filed a 1989 Mid-Year Report in which it disclosed the receipt of a $5,000 from Northwest National Bank Political Action Committee with a date of January 5, 1989. This contribution can only be the same $5,000 contribution the Northwest National Bank PAC reported making on October 28, 1988, to Victory '88 in care of James F. Keenan.

Approximately 69 days elapsed from the reported date of the making of this contribution to the reported date of the receipt of this contribution. Thus, it does not appear that this

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contribution was forwarded within the 10-day period required by the Act. Furthermore, the contribution was reported as made to Victory '88 and sent to the Respondent in South Carolina but was reported as received by the Baltimore County Victory '88. Thus, it does not appear that this contribution was forwarded to the treasurer of the proper committee.

Therefore, there is reason to believe James F. Keenan violated 2 U.S.C. § 432(b)(2).

2004031383

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: James F. Keenan
Pace Industries, Inc.
217 Easy Street
Aiken, SC 29801

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

2934

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from June 30, 1988, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040311335

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

1. State whether you received a $5,000 check from the Northwest National Bank Political Action Committee.

2. State the date you received the check.

3. Identify to whom the check was payable.

4. State whether you requested or solicited the check. If so, provide copies of all writings or documents relating to such request or solicitation.

5. State whether a third person(s) requested or solicited this check to be sent to you and, if so, identify the person(s) and explain why it was sent to you.

6. State whether you had any role or participation in Victory '88, the Bush/Quayle campaign, and the Republican National Committee in 1988 and, if so, describe in detail your role or participation in each and how such role or participation related to your handling of the Northwest National Bank Political Action Committee check.

7. Identify to whom you forwarded the $5,000 check from Northwest National Bank Political Action Committee, the date you forwarded it, and the method of forwarding.

8. State whether any third person(s) requested or directed your forwarding of the check and, if so, identify the person(s) and explain in detail the instructions you were given.

9. Explain how it came to pass that a check issued by the Northwest National Bank Political Action Committee and sent to you on or about October 28, 1988, was reported as received by the Baltimore County Victory '88 on January 5, 1989.

10. List all other contributions you received with respect to Victory '88 or the Bush/Quayle campaign, including the date and amount of each contribution, and identify to whom each contribution was forwarded and the date of forwarding.

11. Provide copies of all documents relating to your response to these interrogatories.

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

November 6, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marjorie J. Neuman, Treasurer
Baltimore County Victory '88
4226 Thorncliff Road
Baltimore, MD 21236

RE: MUR 2936

Dear Ms. Neuman:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached order and subpoena which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

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

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information with 15 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

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If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (800) 424-9530.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

2240311339

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Marjorie J. Neuman, Treasurer
Baltimore County Victory '88
4226 Thorncliff Road
Baltimore, MD 21236

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested in the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 3rd, day of November 1989.

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Request and Questions (3 pages)

2003040291

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from June 30, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2040311392

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

The following questions relate to a $5,000 contribution from the Northwest National Bank Political Action Committee that the Baltimore County Victory '88 reported in its 1989 Mid-Year Report as received on January 5, 1989.

1. State the date you received the check for this contribution.

2. State the date you deposited this check in your campaign depository. Provide a copy of the deposit slip.

3. State the method by which you received the check for this contribution and identify the person(s) from whom you received the check. Provide copies of all writings or documents relating to the receipt of this check.

4. State whether the Baltimore County Victory '88 requested or solicited this contribution. If so, identify the person(s) who made the request or solicitation. Provide copies of all writings or documents relating to any request or solicitation of this contribution.

5. Explain in detail how it came to pass that a contribution reported by the Northwest National Bank Political Action Committee of Fayetteville, Arkansas, as made to Victory '88 in care of James F. Keenan in Aiken, South Carolina, on October 28, 1988, was reported as received by the Baltimore County Victory '88 with the date of January 5, 1989.

6. Provide copies of all documents relating to your response to this subpoena.

2 0 3 1 1 3 2 4

06C4597

CHARLES B. THOMAS ††
EMIL HIRSCH ††
ARNOLD S. ALBERT †••
BRADSHAW ROST †••□
PATRICK J. KEARNEY ††

†DC †FLA
•MD □NY
• VA

LAW OFFICES
THOMAS, HIRSCH & ALBERT, P.C.
SUITE 720
1828 L STREET, N.W.
WASHINGTON, DC 20036
(202) 822-6333
FACSIMILE: 822-6665

SUITE 503
51 MONROE STREET
ROCKVILLE, MD 20850

VIRGINIA
10615 JUDICIAL DRIVE
JUDICIAL COURT, SUITE 103
FAIRFAX, VA 22030

OF COUNSEL
PATRICIA A. DIXON •

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 NOV 17 PM 4:24

November 17, 1989

Hand Delivery

Mr. Danny L. McDonald
Chairman
Federal Election Commission
Room 659999 E Street, N.W.
Washington, DC 20463

89 NOV 17 PM 5:00
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 2936-James F. Keenan

Dear Mr. McDonald:

This office represents James F. Keenan with reference to your November 6, 1989 inquiry to him concerning a possible violation of 2 U.S.C. Section 432(b)(2). His Fayettville, Arkansas office received your letter on November 8, 1989 and it was forwarded to Mr. Keenan the following day at his residence in Aiken, South Carolina. Enclosed is the original Statement of Designation of Counsel which Mr. Keenan has executed.

Please consider this letter as a request by Mr. Keenan for an extension for the period of twenty (20) days to respond to your November 6, 1989 letter or otherwise to pursue conciliation.

The facts of this situation are fairly simple. Mr. Keenan did receive a $5,000 contribution from the Northwest National Bank Political Action Committee on or about October 28, 1988. He forwarded it to the Team 100 office of the Republican National Committee ("RNC") immediately thereafter. Unfortunately, I am advised by the RNC that a preliminary review of their records does not indicate receipt of said contribution or how it ended up being negotiated by the Baltimore County Victory-88 in January, 1989. I am further advised that the coordinator of that office, Mr. Fred Bush, is out of the country until after the Thanksgiving holiday. Accordingly, Mr. Keenan cannot adequately respond to the Interrogatories propounded with your November 6, 1989 correspondence without further input from Mr. Bush and more information from the records of the RNC. Mr. Keenan has no personal knowledge of what happened to the contribution after it left his hands.

Please advise at your earliest convenience of whether the extension will be granted. I will look forward to hearing from you.

Very truly yours,

Charles B. Thomas

Charles B. Thomas

CBT:jlm

Enclosure

cc: Mr. James F. Keenan

6
3
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-
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4
0
0
2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: Charles B. Thomas

ADDRESS: Thomas, Hirsch & Albert, P.C.
1828 L Street, N.W., Suite 720
Washington, D.C. 20036

TELEPHONE: (202) 822-6333

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

11/15/89
Date

James F. Keenan
Signature

RESPONDENT'S NAME: James F. Keenan

ADDRESS: 217 Easy Street
Aiken, SC 29801

HOME PHONE: (803) 642-6873

BUSINESS PHONE: (501) 443-1455

2003113397

06C4632

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 NOV 22 AM 11:29

PETTUS LAW FIRM
151 WEST DICKSON
P.O. BOX 1665
FAYETTEVILLE, ARKANSAS 72702

E. LAMAR PETTUS
DONNA C. PETTUS
C. ALAN GAULDIN

TELEPHONE (501) 443-2363
TELECOPIER (501) 443-0390

November 21, 1989

Lawrence M. Noble
General Counsel
Federal Election Commission
999 East Street N.W.
Washington, D.C. 20463

ATTN: Jeffrey D. Long

RE: MUR 2936, Interrogatories and Requests for Production of Documents

Dear Mr. Noble:

In response to your letter dated November 6, 1989 and the accompanying Interrogatories and Requests for Production of Documents, enclosed please find the Responses of Virginia T. Morris, President of Northwest National Bank Political Action Committee, along with a Statement of Designation of Counsel whereby Ms. Morris designates me as her attorney in this matter.

Thank you for your consideration of these responses.

Sincerely,

for E. Lamar Pettus

En.

cc: Virginia T. Morris, Northwest National Bank

VIA: AIRBORNE

ELP/dsf

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 NOV 22 AM 11:29

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: E. Lamar Pettus

ADDRESS: P. O. Box 1665
Fayetteville, AR 72702

TELEPHONE: (501) 443-2363

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

November 1989
Date

X Virginia T. Morris President
Signature

RESPONDENT'S NAME: Northwest National Bank Political Action Committee

ADDRESS: 3500 North College
Fayetteville, AR 72701

HOME PHONE:

BUSINESS PHONE: (501) 521-8000

Pursuant to the Federal Election Commission letter dated November 6, 1989, Northwest National Bank Political Action Committee is not a "respondent" in the matter, but rather a witness. However it would be our interpretation on the Statement of Designated Counsel, you intend that the organization responding the the questions be inserted on the line you had marked "respondents name".

2940318379

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 NOV 22 AM 11:29

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

RESPONSE TO THE REQUEST FOR PRODUCTION OF DOCUMENTS AND RESPONSE TO INTERROGATORIES

Virginia T. Morris, President Northwest National Bank Political Action Committee submits the following answers to the subpoena to produce documents and order to submit written answers dated the 3rd day of November 1989:

INTERROGATORY NO. 1: State to whom the check for this contribution (a $5,000.00 contribution from Northwest National Bank Political Action Committee that you reported as made on October 28, 1988, to Victory, '88 in care of James F. Keenan, Pace Industries, Inc., Aiken, South Carolina) was made payable. Provide a copy of the front and back of the cancelled check.

RESPONSE NO. 1: Attached is the front and back of the cancelled check. The check indicates it was made payable to Victory, '88.

INTERROGATORY NO. 2: Identify the person/(s) who requested or solicited this contribution and explain the reasons and purpose for making this contribution. Provide copies of all writings or documents relating to the request or solicitation of this contribution.

RESPONSE NO. 2: Mr. Keenan called Virginia T. Morris, as an individual, and asked if she would be interested in becoming a member of the "Committee for 100". Ms. Virginia T.

Morris declined; however, advised Mr. Keenan the Northwest National Bank Political Action Committee would more than likely make a general contribution to Victory, '88. The purpose for the $5,000.00 contribution as is indicated by the letter under date October 28th, 1988, was to allow Victory, '88 to place the funds "where needed and legally eligible." Attached is a copy of the letter from Virginia T. Morris, in her representative capacity for the Northwest National Bank Political Action Committee, to Mr. James F. Keenan. The letter is dated October 28, 1988.

INTERROGATORY NO. 3: State to whom the check for this contribution was sent, the method of sending, the date it was sent. Provide copies of all writings or documents relating to the transmittal of this check.

RESPONSE NO. 3: The letter of transmittal is dated October 28, 1988. The check was mailed through the United States postal system. The letter was mailed October 28, 1988.

INTERROGATORY NO. 4: Explain in detail how it came to pass that this contribution was eventually reported as being received by the Baltimore County Victory '88 with the date of January 5, 1989.

RESPONSE NO. 4: No one involved with the Northwest National Bank Political Action Committee has any knowledge with which to answer this question.

INTERROGATORY NO. 5: State whether you intended this contribution to be forwarded to the Baltimore County Victory '88

at the time you made the contribution and state whether any such intent was communicated to anyone. If so, identify the person (s) so informed.

RESPONSE NO. 5: The letter dated October 28, 1988, a copy which has been provided states the intention of Northwest National Bank Political Action Committee. The contribution was made to Victory '88 for Victory '88 to place where needed and legally eligible. It was our understanding the contribution would be used as the Victory '88 committee deemed necessary to support Republican candidates. There were no specific instructions and/or discussions concerning where the funds would be placed.

INTERROGATORY NO. 6: Provide copies of all documents relating to your response to this subpoena.

RESPONSE NO. 6: Attached letter dated October 28, 1988; the front and back of the check; copies of Report of Receipts and Disbursements with the summary for the period of 10-20-88 thru 11-28-88 and for the period of 11-28-88 thru 12-30-88.

Respectfully submitted this 17th day of November 1989.

NORTHWEST NATIONAL BANK POLITICAL ACTION COMMITTEE

BY: Virginia T. Morris
Virginia T. Morris, President

ACKNOWLEDGMENT

STATE OF ARKANSAS)
)SS
COUNTY OF WASHINGTON)

On this 22nd day of November, 1989, the undersigned, a Notary Public, duly commissioned, qualified and acting, within and for said County and State, appeared in person the within named Virginia T. Morris, to me personally known, who stated she is the Treasurer of the Northwest National Bank Political Action Committee, and as Treasurer acknowledged she had so signed, and executed and delivered the foregoing response as set forth herein.

IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal this 22 day of November, 1989.

Notary Public

1990-40113

P. O. Box 1407
Fayetteville, Arkansas
October 28, 1988

Mr. James F. Keenan
Pace Industries, Inc.
217 Easy Street
Aiken, South Carolina 29801

Dear Jim:

Enclosed is a Northwest National Political Action Committee check in the amount of $5000. made payable to Victory 88 for you to place where needed and legally eligible.

I had a nice visit with Mr. Chesley Pruitt the other day. He said Arkansas had their money. We are very hopeful Vice-President Bush will carry the state. Mr. Pruitt was contacting Mary Ann Stephens to visit with William Dillard, Sr. relative to his possible interest in the Team 100 Program.

Jonelle Hunt and I had a very friendly conversation; however, neither she nor J. B. wish to be involved in the political process in any manner. She did say she knew that was the wrong attitude, but felt rather strongly about it.

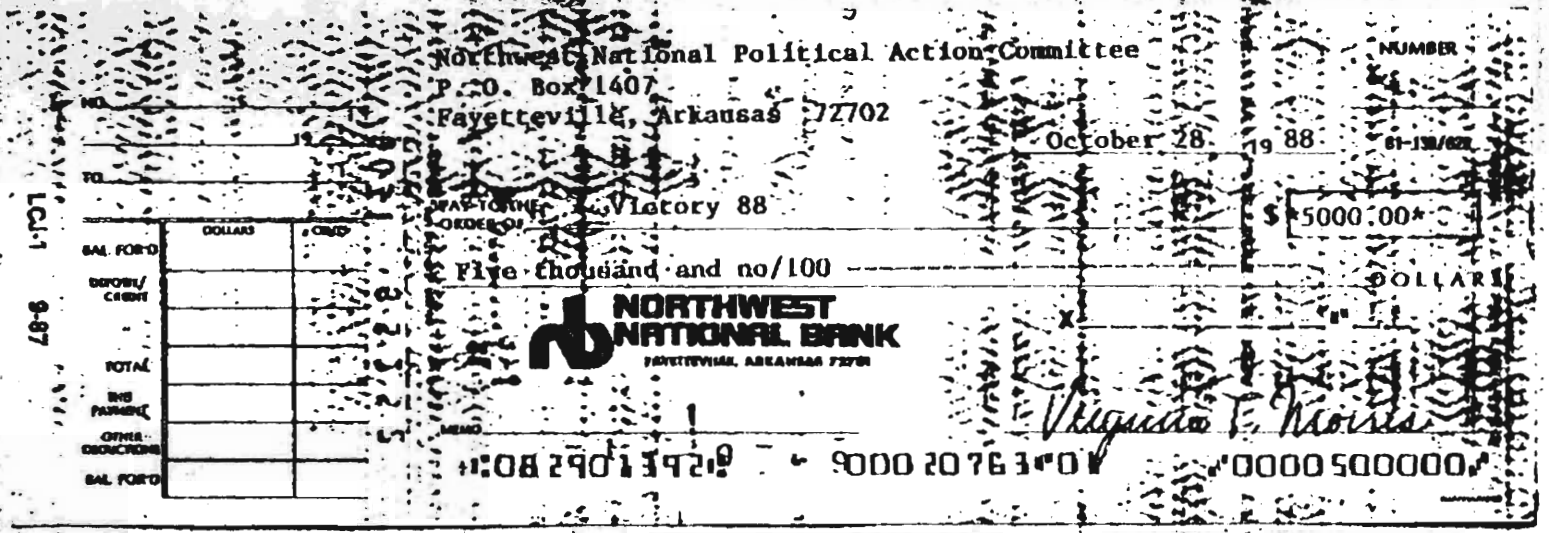
I am now in the process of locating Sam Walton and H. L. Hembree and should be able to visit with them the first of the week. Also there is a call into Bob relative to Jack Frost and the Harvey Jones Funds.

Hello to Susan.

Sincerely,

Virginia

Virginia T. Morris



Northwest National Political Action Committee
P. O. Box 1407
Fayetteville, Arkansas 72702

NUMBER

October 28 19 88

61-138/622

PAY TO THE ORDER OF Victory 88

$ 5000.00*

Five thousand and no/100 ---------- DOLLARS

NORTHWEST NATIONAL BANK
FAYETTEVILLE, ARKANSAS 72701

MEMO

X Virginia E. Morris

LCL-1 9-87

DOLLARS | CENTS

BAL. FOR'D

DEPOSIT/ CREDIT

TOTAL

THIS PAYMENT

OTHER DEDUCTIONS

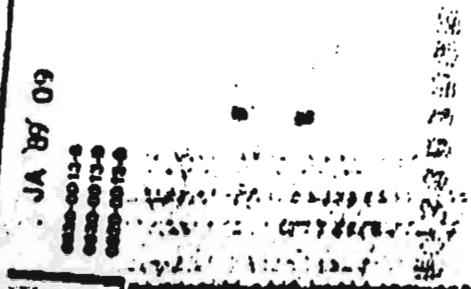
BAL. FOR'D

:103290139: 9000207631 0000500000

9000408190

deposit only
242-13936







4 0 3 1 1 3 0 6

1988 PAC Report 10-19-88 to 11-28-88

	Chq	Dep	Bal
			7370.00
Nov Mtg		225,00	
Victory 88	5000,00 (not cleared)		
City of Fay Herb	500,00		
Citizen for Fair Taxation	1000,00		1095,00

1988 Dec Report 11-28-88 to 12-30-88

Dec Mtg		225,00	
(5000,00 chq not yet cleared:			1320,00
stmt bal = 6320,00)			

J J 4 0 3 1 1 9 J 7

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Northwest National Bank Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
3500 North College

CITY, STATE and ZIP CODE
Fayetteville, AR 72701

2. FEC IDENTIFICATION NUMBER
000168385

3. ☐ This committee qualified as a multicandidate committee **DURING THIS** Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Thirtieth day report following the General Election on 11-8-88 in the State of Arkansas

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period 10-20-88 through 11-28-88		
6. (a)	Cash on Hand January 1, 19____		$ 7120.00
(b)	Cash on Hand at Beginning of Reporting Period	$ 7370.00	
(c)	Total Receipts (from Line 18)	$ 225.00	$ 2475.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 7595.00	$ 9595.00
7.	Total Disbursements (from Line 28)	$ 6500.00	$ 8500.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1095.00	$ 1095.00
9.	Debts and Obligations Owed **TO** the Committee (Itemize all on Schedule C and/or Schedule D)	$ NA	
10.	Debts and Obligations Owed **BY** the Committee (Itemize all on Schedule C and/or Schedule D)	$ NA	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Obert M. Undem

Signature of Treasurer
Obert M Undem
By Frances McCabe

Date
12-8-88

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period
Northwest National Bank Political Action Committee	From: 10-20-88 To: 11-28-88

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	225.00	2475.00	11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	225.00	2475.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	225.00	2475.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5000.00	6600.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS	1500.00	1900.00	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	6500.00	8500.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	225.00	2475.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0.00	0.00	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	225.00	2475.00	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)			32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			34

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 2 for LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Northwest National Bank Political Action Committee

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
Dr. Floyd R. Harris 2001 Green Acres Road Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self Orthodontist 275.00	11-22-88	25.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
D. Vincent Morris 302 E. Tulsa St. Siloam Springs, AR 72761 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self Investor 275.00	11-22-88	25.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Marjorie H. Niblock P. O. Box 182 Fayetteville, AR 72702 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Niblock Law Office Office Manager 275.00	11-22-88	25.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Obert M. Undem 26 East Meadow Fayetteville, AR 72702 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self Attorney 275.00	11-22-88	25.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Joe B. Morris 3372 North College Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Houston Taylor Motor Company, Inc. President 275.00	11-22-88	25.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
C. Thomas Pearson, Jr. 36 East Center Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Self Attorney 275.00	11-22-88	25.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date–$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

SUBTOTAL of Receipts This Page (optional)	150.00
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

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

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

Name of Committee (in Full)
Northwest National Bank Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Jerry D. Sweetser 1950 Bois De Arc Fayetteville, AR 72701	Sweetser Construction Company, Inc.	11-22-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: President		
	Aggregate Year-to-Date—$ 275.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mr. George T. Williams P. O. Box 1505 Fayetteville, AR 72701	Northwest Oil Company Inc.	11-22-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: President		
	Aggregate Year-to-Date—$ 275.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Virginia T. Morris 2916 Sheryl Fayetteville, AR 72701	Northwest National Bank	11-22-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Chairman and CEO		
	Aggregate Year-to-Date—$ 275.00		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

SUBTOTAL of Receipts This Page (optional)	75.00
TOTAL This Period (last page this line number only)	225.00

EDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER

y 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 poses, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Northwest National Bank Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Victory 88 c/o Mr. James F. Keenan Pace Industries, Inc. 217 Easy Street, Aiken, SC 29801	contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10-28-88	5000.00
B. Full Name, Mailing Address and ZIP Code City of Fayetteville Herbicide Ad Campaign Attn: Mr. Scott Linebaugh City Admin Bldg., Fayetteville, AR	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10-28-88	500.00
C. Full Name, Mailing Address and ZIP Code Citizens for Fair Taxation Attn: Mr. Jim Glenn McIlroy Bank and Trust Fayetteville, AR 72701	contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10-28-88	1000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

P-493 112 563

NORTHWEST NATIONAL BANK
Drawer 1407
11 & 3500 North College
Fayetteville, Arkansas 72702

Fold at line over top of envelope to the right of the return address

CERTIFIED

P-493 112 563

MAIL

Secretary of State
State Capitol Building
Little Rock, AR 72201

P-493 112 563

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to Secretary of State

Street and No. State Capitol Build

P.O. State and ZIP Code Little Rock, AR. 72201

Postage .90

Certified Fee .85

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing to whom and Date Delivered

Return Receipt Showing to whom, Date, and Address of Delivery

TOTAL Postage and Fees 2.20

Postmark or Date

PS Form 3800, June 1985 U.S.G.P.O. 153-506

P-493 112 562

Federal Election Commissi

999 E. Street NW
Washington DC 20463

Postage	$ .45
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	.90
TOTAL Postage and Fees	$2.20
Postmark or Date	

PS Form 3800, June 1985

Fold at line over top of envelope to the right of the return address

CERTIFIED MAIL

P-493 112 562

Federal Election Commission
999 E. Street NW
Washington DC 20463

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Federal Election Commission
999 E. Street NW
Washington DC 20463

4. Article Number
P-493 112 562

Type of Service:
☐ Registered ☒ Certified ☐ Express Mail ☐ Insured ☐ COD

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery
RECEIVED FEDERAL ELECTION COMMISSION MAIL ROOM 88 DEC 12 AM 1:46

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

NORTHWEST NATIONAL BANK
Drawer 1407
11 & 3500 North College
[illegible] Arkansas 72703

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

TYPE OR PRINT

1. C00168385 N 219 122088
VIRGINIA T MORRIS
NORTHWEST NATIONAL BANK POLITI
CAL ACTION COMMITTEE
3500 N COLLEGE AVENUE
FAYETTEVILLE AR 72701

ted

2. FEC IDENTIFICATION NUMBER
000168385

3. ☐ This committee qualified as a multicandidate committee **DURING THIS** Reporting Period on _____(date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ 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 _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period 11-28-88 through 12-30-88		
6. (a)	Cash on Hand January 1, 19 88		$ 7120.00
(b)	Cash on Hand at Beginning of Reporting Period	$ 1095.00	
(c)	Total Receipts (from Line 18)	$ 225.00	$ 2700.00
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 1320.00	$ 9820.00
7.	Total Disbursements (from Line 28)	$ 0.00	$ 8500.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1320.00	$ 1320.00
9.	Debts and Obligations Owed **TO** the Committee (Itemize all on Schedule C and/or Schedule D)	$ NA	
10.	Debts and Obligations Owed **BY** the Committee (Itemize all on Schedule C and/or Schedule D)	$ NA	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer
Obert M. Undem

Signature of Treasurer
Obert M Undem
by Frances M Dahle AVP

Date
1-31-89

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period		
Northwest National Bank Political Action Committee	From: 11-28-88	To: 12-30-88	
I. RECEIPTS	**COLUMN A Total This Period**	**COLUMN B Calendar Year-To-Date**	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	225.00	2700.00	11(a)(i
(ii) Unitemized			11(a)(i
(iii) Total of contributions from individuals			11(a)(i
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	225.00	2700.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	225.00	2700.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	0.00	8500.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	225.00	2700.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	225.00	2700.00	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)			32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			34

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 2 for LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Northwest National Bank Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Floyd R. Harris 2001 Green Acres Road Fayetteville, AR 72701	Self	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Orthodontist Aggregate Year-to-Date—$ 300.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
D. Vincent Morris 302 E. Tulsa St. Siloam Springs, AR 72761	Self	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Investor Aggregate Year-to-Date—$ 300.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Marjorie H. Niblock P. O. Box 182 Fayetteville, AR 72702	Niblock Law Office	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Office Manager Aggregate Year-to-Date—$ 300.00		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Obert M. Undem 26 East Meadow Fayetteville, AR 72702	Self	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Attorney Aggregate Year-to-Date—$ 300.00		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Joe B. Morris 3372 North College Fayetteville, AR 72701	Houston Taylor Motor Company, Inc.	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: President Aggregate Year-to-Date—$ 300.00		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
C. Thomas Pearson, Jr. 36 East Center Fayetteville, AR 72701	Self	12-13-88	25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: Attorney Aggregate Year-to-Date—$ 300.00		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

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

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code Mr. Jerry D. Sweetser 1950 Bois De Arc Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Sweetser Construction Company, Inc. Occupation President Aggregate Year-to-Date—$ 300.00	Date (month, day, year) 12-13-88	Amount of Each Receipt this Period 25.00
B. Full Name, Mailing Address and ZIP Code Mr. George T. Williams P. O. Box 1505 Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Northwest Oil Company Inc. Occupation President Aggregate Year-to-Date—$ 300.00	Date (month, day, year) 12-13-88	Amount of Each Receipt This Period 25.00
C. Full Name, Mailing Address and ZIP Code Virginia T. Morris 2916 Sheryl Fayetteville, AR 72701 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Northwest National Bank Occupation Chairman and CEO Aggregate Year-to-Date—$ 300.00	Date (month, day, year) 12-13-88	Amount of Each Receipt This Period 25.00
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)			
TOTAL This Period (last page this line number only)			225.00

P-493 112 612

Federal Election Comm
999 E Street NW
Washington, DC 20463

Postage	.45
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom Date and Address of Delivery	.90
TOTAL Postage and Fees	2.20

PS Form 3800, June 1985 U.S.G.P.O. 1985

CERTIFIED MAIL

P-493 112 612

Federal Election Commission
999 E. Street NW
Washington, DC 20463

NORTHWEST NATIONAL BANK
Drawer 1407
3500 / 11 North College
Fayetteville, Arkansas 72702-1407

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Federal Election Commission
999 E Street NW
Washington, DC 20463

4. Article Number
P-493 112 612

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery

8. Addressee's Address *(ONLY if requested and fee paid)*

89 FEB -4 AM 11:15
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

P-493 112 613

Sec of State
State Capitol
Little Rock, AR 72201

Postage	.45
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom and Date Delivered	
Return Receipt Showing to Whom, Date, and Address of Delivery	.90
TOTAL Postage and Fees	2.20
Postmark or Date	

PS Form 3800, June 1985 U.S.G.P.O. 1985

Secretary of State
State Capitol Building
Little Rock, AR 72201

CERTIFIED MAIL
P-493 112 613

P 493 112 613

NORTHWEST NATIONAL BANK
Drawer 1407
3500 / 11 North College
Fayetteville, Arkansas 72702-1407

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Secretary of State
State Capitol Building
Little Rock, AR 72201

4. Article Number
P-493 112 613

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X

7. Date of Delivery
2-3-89

8. Addressee's Address (ONLY if requested and fee paid)
256 State Capitol
L.R. Ark 72201

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

Charles B. Thomas, Esquire
Thomas, Hirsch & Albert, P.C.
1828 L Street, N.W., Suite 720
Washington, D.C. 20036

RE: MUR 2936
James F. Keenan

Dear Mr. Thomas:

This is in response to your letter dated November 17, 1989, which we received on November 17, 1989, requesting an extension of 20 days to respond to the Interrogatories. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 14, 1989.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2004031921

OGC 4650

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 27 PM 1:01

Marjorie J. Neuman
4226 Thorncliff Road
Baltimore, Maryland 21236

November 22, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 NOV 27 AM 9:47

2004081922

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence M. Noble,
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936

Dear Mr. Noble:

Enclosed are my answers and various documents which are being sent in response to the order and subpoena of November 6, 1989.

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

Very truly yours,

Marjorie J. Neuman

Marjorie J. Neuman

Encs.

Marjorie J. Neuman

Response to Subpoena to Produce Written Documents/ Order to Submit Written Answers

1. To the best of my memory, I received the check in question on or about January 5, 1989. It is my practice to deposit checks the day received or as soon thereafter as possible.

2. I deposited this check on January 5, 1989. A copy of the deposit slip is enclosed as instructed.

3. This check was handed to me by Congresswoman Helen Delich Bentley (Md. R. 2nd) in her Towson District Office, 200 E. Joppa Road, Towson, Maryland 21204. Telephone 301-337-7222. Congresswoman Bentley was Maryland Chairman of the Victory '88 Campaign. I was Co-Chairman of Baltimore County Victory '88. There was a letter with the check, a copy of which is enclosed as requested. (11/10/88 letter from Henderson to Tyson).

4. To my knowledge, Baltimore County Victory '88 did not request or solicit this contribution.

5. I know nothing of the time frame or the circuit of the check other than what is indicated in the Henderson letter of 11/10/88.

6. Included with this response are a copy of the check from Northwest National Political Action Committee dated October 28, 1988 for $5,000 and a copy of Baltimore County Victory '88 1989 mid-year report, itemized receipts, Schedule A p.1, wherein the check was reported. I have no other documents to provide.

Dated:
Nov. 22, 1989

Marjorie J. Neuman

Marjorie J. Neuman
4226 Thorncliff Road
Baltimore, Maryland 21236
Telephone: 301-665-2871

STATE OF MARYLAND
COUNTY OF BALTIMORE SS:

I HEREBY CERTIFY that before me, the subscriber, a Notary Public in and for the State and County aforesaid, personally appeared Marjorie J. Neuman and she made oath in due form of law that the matters and facts in the answers above are true to the best of her knowledge, information and belief.

AS WITNESS my hand and seal this 22ND day of November 1989.

Patricia Klenderka
Notary Public

My Commission Expires:
July 1, 1990

217 Easy Street
Aiken, SC 29801

November 10, 1988

Ms. Betsy Tyson
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, Southeast
Washington, D.C. 20003

Dear Betsy:

Per our telephone conversation this morning, I am enclosing the check I mentioned.

I certainly appreciate all your assistance, and look forward to meeting you this winter.

Sincerely,

Susan Henderson
Secretary to Mr. and Mrs.
James F. Keenan

Encl.

C10405119924

DEPOSITS ARE ACCEPTED SUBJECT TO THE CONDITIONS PRINTED ON THE REVERSE SIDE OF THIS TICKET

DATE JAN 5 1989

	Dollars	Cents
CURRENCY		
COIN		
TOTAL CASH		
CHECKS BY BANK NO		
1 15-157	150	00
2 81-139	5000	00
3		
4		
5		
6	available	
7	on 7th	
8	Bank checks	
9	for 7 days.	
10		
11		
12		
13		
14		
15		
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24		
25		
26		
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28		
29		
30		
31		
32		
33		
34		
35		
36		
37		
38		
TOTAL	5150	00

Item Count

Bank Use Only

ENDORSE ALL ITEMS WITH NAME AND CODE NUMBER

CUSTOMER'S COPY

SIGNET BANK
Maryland

YOUR ACCOUNT NUMBER

B.C. VICTORY INC
4 [illegible]
[illegible]

5.55 KISSED

KISSER ASSOC
N.U. NAT. PAC

⑈0240⑆11⑆26⑈

NO. _____ $ _____

_____ 19 _____

TO _____

	DOLLARS	CENTS
BAL. FOR'D		
DEPOSIT/ CREDIT		
"		
TOTAL		
THIS PAYMENT		
OTHER DEDUCTIONS		
BAL. FOR'D		

LCJ-1 9-87

Northwest National Political Action Committee
P. O. Box 1407
Fayetteville, Arkansas 72702

NUMBER _____

October 28 19 88

81-139/829

PAY TO THE ORDER OF Victory 88 $ *5000.00*

Five thousand and no/100 ---------- DOLLARS

NORTHWEST NATIONAL BANK
FAYETTEVILLE, ARKANSAS 72701

X _____

MEMO _____

Virginia T. Morris

⑆082901392⑆ 000207631⑈01

9 7 6 1 1 9 0 4 0 5 1 6

Expl. Copy 7/17/89 Rep. 1/1/89 - 6/30/89

SCHEDULE A ITEMIZED RECEIPTS

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

PAGE 1 OF 1

FOR LINE NUMBER 11

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)

BALTIMORE COUNTY VICTORY '88

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code KISNER & ASSOCIATES 1010 VERMONT AVE WASHINGTON, D.C. 20015 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Occupation Aggregate Year-to-Date > $ 550.00	1/5/89	$550.00
B. Full Name, Mailing Address and ZIP Code NORTHWEST NATIONAL POLITICAL ACTION COMMITTEE PO BOX 1407 FAYETTEVILLE, ARK. 72702 Receipt For: ☐ Primary ☐ General ☒ Other (specify):	Occupation Aggregate Year-to-Date > $ 5,000.00	1/5/89	$5,000.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > $		
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > $		
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > $		
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > $		
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > $		

SUBTOTAL of Receipts This Page (optional)	N/A
TOTAL This Period (last page this line number only)	$5,550.00

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: ROBERT F. SCHOLZ

ADDRESS: NILES, BARTON & WILMER
111 S. CALVERT ST. SUITE 1400
BALTIMORE MARYLAND

TELEPHONE: 21201-3200

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

Nov. 14, 1989
Date

Marjorie J. Neuman
Signature

RESPONDENT'S NAME: MARJORIE J. NEUMAN

ADDRESS: 4206 THORNCLIFF RD
BALTO. MD. 21236

HOME PHONE: 301-665-2871

BUSINESS PHONE: —

2936 0219 28

OGC 4868

LAW OFFICES
THOMAS, HIRSCH & ALBERT, P.C.
SUITE 720
1828 L STREET, N.W.
WASHINGTON, DC 20036
(202) 822-6333
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CHARLES B. THOMAS ‡
EMIL HIRSCH ‡•
ARNOLD S. ALBERT ‡••
BRADSHAW ROST ‡•• □
PATRICK J. KEARNEY ‡•
‡DC ‡FLA
•MD □NY
•VA

MARYLAND
SUITE 503
51 MONROE STREET
ROCKVILLE, MD 20850

VIRGINIA
10615 JUDICIAL DRIVE
JUDICIAL COURT, SUITE 103
FAIRFAX, VA 22030

OF COUNSEL
PATRICIA A. DIXON •

December 14, 1989

Jeffrey D. Long, Esquire
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

HAND DELIVERY

89 DEC 14 PM 3:41
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: James F. Keenan
MUR 2936

Dear Mr. Long:

Enclosed are the responses of James F. Keenan to the interrogatories which were forwarded to him in the above-referenced matter. Also enclosed is the Statement of Designation of Counsel through which Mr. Keenan has identified the undersigned as his counsel in this matter.

As we discussed, it is Mr. Keenan's desire to cooperate with the Federal Election Commission in resolving this matter without undue effort and expense. After you have had the opportunity to review the enclosed in conjunction with the other materials you have received, please do not hesitate to contact me if you need or wish additional information.

Very truly yours,

Charles B. Thomas

Charles B. Thomas

CBT:dmt
Enclosures
3020.5775

cc: Mr. James F. Keenan

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2936

NAME OF COUNSEL: Charles B. Thomas

ADDRESS: Thomas, Hirsch & Albert, P.C.
1828 L Street, N.W., Suite 720
Washington, D.C. 20036

TELEPHONE: (202) 822-6333

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

11/15/89
Date

James F. Keenan
Signature

RESPONDENT'S NAME: James F. Keenan

ADDRESS: 217 Easy Street
Aiken, SC 29801

HOME PHONE: (803) 642-6873

BUSINESS PHONE: (501) 443-1455

2936 - 1930

RESPONSES OF JAMES F. KEENAN (MUR 2936)

1. State whether you received a $5,000 check from the Northwest National Bank Political Action Committee.

Answer: Yes.

2. State the date you received the check.

Answer: I believe I received the check in late October or early November, 1988, but I cannot be sure of the exact date because my recollection is unclear and I did not keep any written record of the matter.

3. Identify to whom the check was payable.

Answer: I believe the check was made payable to Victory '88, but I am not certain of that fact. I believe my response is somewhat influenced by the Factual and Legal Analysis which was forwarded to me.

4. State whether you requested or solicited the check. If so, provide copies of all writings or documents relating to such request or solicitation.

Answer: The check was sent to me through the offices of Virginia Morris, the President of the Northwest National Bank in Fayetteville, Arkansas. I had requested that Mrs. Morris join the Team 100 to show her support for George Bush. Mrs. Morris declined and forwarded to me the $5,000 contribution. I possess no writings or documents relating to the conversations Mrs. Morris and I had.

5. State whether a third person(s) requested or solicited this check to be sent to you and, if so, identify the person(s) and explain why it was sent to you.

Answer: I was not solicited by anyone to request that Mrs. Morris forward this check to me.

6. State whether you had any role or participation in Victory '88, the Bush/Quayle campaign, and the Republican National Committee in 1988 and, if so, describe in detail your role or participation in each and how such role or participation related to your handling of the Northwest National Bank Political Action Committee check.

Answer: I was a supporter of George Bush in the 1988 campaign and made certain personal contributions to the Republican National Committee State Election Committee. In addition, I also made requests of certain family members and close associates that they also assist Mr. Bush in his campaign to become President. I do not possess any written materials concerning my participation in the campaign. As related in my answer to Question 4 above, the $5,000 contribution was the result of a conversation I had with Mrs. Morris about joining Team 100.

7. Identify to whom you forwarded the $5,000 check from Northwest National Bank Political Action Committee, the date you forwarded it, and the method of forwarding.

Answer: Immediately upon my receipt of the $5,000 check from the Northwest National Bank Political Action Committee, I forwarded it by mail to the Republican National Committee c/o the Team 100 Coordinator.

8. State whether any third person(s) requested or directed your forwarding of the check and, if so, identify the person(s) and explain in detail the instructions you were given.

Answer: No third party requested or directed that I forward this contribution to Team 100. It seemed the logical thing to do as I was a member of this group and the check was a result of my request that Virginia Morris join it.

9. Explain how it came to pass that a check issued by the Northwest National Bank Political Action Committee and sent to you on or about October 28, 1988 was reported as received by the Baltimore County Victory '88 on January 5, 1989.

Answer: I cannot explain the delay between the sending of the check by the Northwest National Bank Political Action Committee on October 28, 1988 and its being received by the Baltimore County Victory '88 on January 5, 1989. As stated above, I received it and simply forwarded it on to the Team 100 Coordinator the same or next day. After forwarding this $5,000 check to the Team 100 headquarters in early November, I have no further information concerning the ultimate use of the contribution.

10. List all other contributions you received with respect to Victory '88 or the Bush/Quayle campaign, including the date and amount of each contribution, and identify to whom each contribution was forwarded and the date of forwarding.

Answer: I received no other contributions with respect to Victory '88 or the Bush/Quayle campaign.

11. Provide copies of all documents relating to your response to these interrogatories.

Answer: I possess no documents concerning the responses made to the questions detailed above.

JAMES F. KEENAN

DATED: December 12, 1989

Subscribed and sworn to before me this 12th day of December, 1989.

Notary Public

My Commission expires: 11/16/97.

2004031-2933

OGC 4950

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

VIRGINIA OFFICE
SUITE 500
2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

December 12, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
89 DEC 22 PM 12:45

Mr. Danny L. McDonald,
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. McDonald:

I represent Congresswoman Helen Delich Bentley in the above-captioned matter. On October 3, 1989, I sent you Congresswoman Bentley's Answers to Interrogatories. I wish to supplement the record with two letters (enclosed). Written by Melvin Bilal and Gregory H. Barnhill, the letters explain the circumstances under which they solicited contributions for the Victory '88 program.

Please do not hesitate to call me if you have any questions.

Respectfully,

Benson Everett Legg

BEL:mtm
Enclosures
4500R/63

cc: Jeffrey Long, Esquire
The Honorable Helen Delich Bentley

RECEIVED
FEDERAL ELECTION COMMISSION
89 DEC 22 PM 12:45

November 30, 1989

Benson Everett Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

Dear Mr. Legg:

I understand that a question has arisen concerning contributions that I solicited last Fall for the Victory '88 program. I am writing to provide you with the pertinent information.

I was approached by Congresswoman Bentley and Richard Taylor, who requested my assistance in organizing a fundraiser for Victory '88. The fundraiser was held at the residence of a physician. Mrs. Bentley was the featured speaker. The contributors were informed that their contributions would be turned over to her or Mr. Taylor, who would apply the contributions to Victory '88 activities as they saw fit. The Victory '88 program was described as an effort (i) to support Republican candidates in the 1988 general election through volunteer activities, and (ii) to help build the Republican Party in Maryland.

The contributors were requested to make their checks payable to "Victory '88." Among the checks that I received were ones written by Tarig Mahmood, M.D., Parvez Shah, M.D., and Shaukat A. Ashai. I collected the checks and forwarded them to Mr. Taylor.

The donations were not solicited for the Maryland State Republican Party. The contributors were informed that the contributions would be turned over to Mr. Taylor or Congresswoman Bentley as described above.

Very truly yours,

Melvin Bilal

MB/jcb
9139F

2004031935

November 27, 1989

Benson E. Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

Dear Mr. Legg:

In reference to contributions that I and others solicited last Fall for "Victory '88," I am writing to provide you with the pertinent information.

I was approached by Congresswoman Helen Delich Bentley, who requested me to raise money for the Victory '88 program. As she explained it to me, the program was an effort (i) to support Republican candidates in the 1988 general election through volunteer activities and (ii) to help build the Republican Party in Maryland.

I approached several people who are either personal friends or business acquaintances. In each case, I explained that I was helping Congresswoman Bentley raise money for the Victory '88 program. I asked each donor to make the check payable to "Victory '88," and I said that the money would be turned over to Congresswoman Bentley. I solicited the contributions with the understanding that Congresswoman Bentley would have the discretion to apply the funds as she saw fit. I did not solicit the contributions for the Maryland State Republican Party and I did not tell the contributors that their checks would be turned over to the Party.

I received checks from the following individuals: James P. Goldsmith, Kenneth Burke, Joseph Payne, June Abel, Robert B. Barnhill, and John J. Foster, Jr.

Very truly yours,

Gregory H. Barnhill

GHB/keb

OGC 5367

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 FEB -9 AM 9:15

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
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(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

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VIRGINIA OFFICE
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2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

February 7, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 FEB -9 AM 10:48

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

Thank you for speaking with me today. For your file, I enclose letters from Parvez Shah, M.D. and Shaukat A. Ashai, M.D. These letters explain the circumstances under which they contributed to "Victory '88."

This is also to confirm that you will not need letters from the individuals who were solicited by Gregory H. Barnhill: James P. Goldsmith, Kenneth Burke, Joseph Payne, June Abel, Robert B. Barnhill, and John J. Foster, Jr. Please do not hesitate to contact me if you subsequently determine that you would like letters from these contributors. Thank you for your courtesy in this matter.

Very truly yours,

Ben Legg

Benson Everett Legg

BEL:mtm
Enclosures
9903F/17

cc: The Honorable Helen Delich Bentley

November , 1989

Benson E. Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, Maryland 21201

Dear Mr. Legg:

I understand that a question has arisen concerning my contribution to Victory '88 in October of last year. I am writing to provide you with the pertinent information.

I attended a fundraiser at the home of a physician. The featured speaker was Congresswoman Bentley. The Congresswoman explained that the party was intended to raise money for the Victory '88 program, which was an effort to support Republican candidates in the 1988 general election and to help build the Republican Party in Maryland.

I was asked to make my check payable to "Victory '88," and I was told that the check would be turned over to Congresswoman Bentley, who is the Republican National Committeewoman for Maryland, or to Richard P. Taylor, the Committeeman. I understood and intended that Congresswoman Bentley and Mr. Taylor would have the discretion to apply the funds to Victory '88 activities as they saw fit.

My donation was not earmarked for the Maryland State Republican Party. I have learned that Congresswoman Bentley deposited my check in the Federal Account of the Carroll County Republican Central Committee. I concur with her decision.

Very truly yours,

Parvez Shah, M.D.

PS/jcb
9139F-4

2 0 0 4 0 3 1 - 2 3 8

November 30, 1989

Benson E. Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, Maryland 21201

Dear Mr. Legg:

I understand that a question has arisen concerning my contribution to Victory '88 in October of last year. I am writing to provide you with the pertinent information.

I attended a fundraiser at the home of a physician. The featured speaker was Congresswoman Bentley. The Congresswoman explained that the party was intended to raise money for the Victory '88 program, which was an effort to support Republican candidates in the 1988 general election and to help build the Republican Party in Maryland.

I was asked to make my check payable to "Victory '88," and I was told that the check would be turned over to Congresswoman Bentley, who is the Republican National Committeewoman for Maryland, or to Richard P. Taylor, the Committeeman. I understood and intended that Congresswoman Bentley and Mr. Taylor would have the discretion to apply the funds to Victory '88 activities as they saw fit.

My donation was not earmarked for the Maryland State Republican Party. I have learned that Congresswoman Bentley deposited my check in the Federal Account of the Carroll County Republican Central Committee. I concur with her decision.

Very truly yours,

Shaukat A. Ashai MD

Shaukat A. Ashai

SAA/jcb
9139F-5

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 FEB -7 AM 10:18

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
James F. Keenan) MUR 2936
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 17, 1989, the Commission found reason to believe that James F. Keenan violated 2 U.S.C. § 432(b)(2) with respect to the forwarding of a $5,000 contribution by the Northwest National Bank Political Action Committee of Fayetteville, Arkansas, that was eventually reported as received by the Baltimore County Victory '88. The Commission also approved interrogatories and requests for documents to Respondent Keenan and the two committees as nonrespondent witnesses. These responses have been received and are attached. See Attachment 1. This report addresses the issues raised with regard to this contribution. Mr. Keenan has not requested preprobable cause conciliation.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that every person who receives a contribution for a political committee which is not an authorized committee shall, if the amount is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(2). See 11 C.F.R. § 102.8(b).

040703

As noted in the General Counsel's Report dated October 5, 1989, Baltimore County Victory '88 reported a $5,000 contribution from the Northwest National Bank Political Action Committee ("Northwest National Bank PAC") with a date of January 5, 1989. Northwest National Bank PAC reported this contribution as made on October 28, 1988, to "Victory '88 c/o Mr. James F. Keenan, Pace Industries, Inc., 217 Easy Street, Aiken, SC 29801." Thus, it did not appear Mr. Keenan had forwarded this contribution within the 10-day period required by 2 U.S.C. § 432(b)(2). The responses from Mr. Keenan, Northwest National Bank PAC, and Baltimore County Victory '88 have more fully explained the making and handling of this contribution.

James Keenan states in his affidavit that he was a member of Team 100 and a supporter of George Bush in the 1988 campaign and that he made requests to family members and close associates to assist the Bush campaign. In that regard, he states that he had a conversation with Virginia Morris, president of the Northwest National Bank PAC in Fayetteville, Arkansas,[1] and requested that she join Team 100 to show her support for Bush. He states that she declined but instead forwarded to him the $5,000 contribution from the PAC made payable to Victory '88. He adds that he was not asked by anyone to contact Mrs. Morris, but he apparently did so on behalf of Team 100, of which he was an agent.

Mrs. Morris states in her affidavit that she was contacted as

1. Although Keenan is located in Aiken, South Carolina, Pace Industries is headquartered in Harrison, Arkansas, which is 50 miles northeast of Fayetteville.

an individual by Keenan about whether she would be interested in becoming a member of the "Committee for 100." She adds that she declined but advised Keenan that the PAC would make a "general contribution" to Victory '88. Accordingly, she states that the PAC issued a check for $5,000 dated October 28, 1988. She states that this check was mailed to Keenan on October 28 with a cover letter. In that letter Mrs. Morris notes the enclosed contribution "made payable to Victory '88 for you to place where needed and legally eligible." She further states:

> ...It was our understanding the contribution would be used as the Victory '88 committee deemed necessary to support Republican candidates. There were no specific instructions and/or discussions concerning where the funds would be placed.

Keenan states that he received this contribution from Mrs. Morris and on the "same or next day" forwarded it to the Republican National Committee ("RNC") in care of the Team 100 coordinator. He adds that after forwarding the check to the Team 100 headquarters "in early November," he had no further information concerning its ultimate use. He further states that no third party requested or directed that he forward this contribution to Team 100 but that "[i]t seemed the logical thing to do as I was a member of this group, and the check was a result of my request that Virginia Morris join it." In earlier correspondence, counsel for Keenan identified Fred Bush as the coordinator of the Team 100 office at the RNC.

Marjorie Neuman, treasurer of Baltimore County Victory '88, states in her affidavit that she received this contribution "on or about January 5, 1989," when it "was handed to me by

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Congresswoman Helen Delich Bentley...in her Towson District Office...." She included a copy of a letter that accompanied the check. This letter was from Susan Henderson, secretary to James Keenan, addressed to Betsy Tyson at the RNC, and dated November 10, 1988. It states: "[p]er our telephone conversation this morning, I am enclosing the check I mentioned." Mrs. Neuman adds that to her knowledge "Baltimore County Victory '88 did not request or solicit this contribution."

These facts sufficiently demonstrate that James Keenan apparently forwarded this contribution to the RNC within the 10-day period established by 2 U.S.C. § 432(b)(2). The contribution was mailed from Arkansas on October 28 to Keenan in South Carolina. Keenan's secretary forwarded the contribution to the RNC on November 10. Keenan states in his affidavit that he forwarded the contribution on the "same or next day" after receiving it. Even if only three days are allowed for the mailing of the contribution from Arkansas to South Carolina, the contribution was still forwarded to the RNC on the 10th day. The documents do not show, however, that Keenan provided the RNC with the date of receipt, as required by Section 432(b)(2), when he forwarded the check.

As noted, Keenan was part of Team 100 and solicited, received, and forwarded this contribution as part of his efforts for Team 100, a project of the RNC. Thus, in our view, Keenan

was the agent of the RNC and his actions are attributable to it.[2] Therefore, it appears more appropriate to hold the RNC responsible for the delay in forwarding this contribution to a Victory '88 committee for deposit.

Accordingly, this office recommends that the Commission take no further action with respect to James Keenan. Instead, this Office recommends that the Commission find reason to believe the Republican National Committee violated 2 U.S.C. § 432(b)(2) with respect to the forwarding of the $5,000 contribution from Northwest National Bank PAC. The facts show that the contribution was forwarded to the RNC and then later delivered to Representative Bentley, who gave it to Mrs. Neuman on or about January 5, 1989, but they do not indicate when the RNC may have received the contribution from Keenan and delivered the contribution to Representative Bentley. The proposed questions to the RNC seek further information regarding the handling of this contribution. We also propose the Commission send the attached questions to Rep. Bentley regarding her role in the handling of this contribution.

III. RECOMMENDATIONS

1. Take no further action against James F. Keenan and close this file with respect to this respondent.

2. Find reason to believe the Republican National

---

2. The RNC did not establish a Victory '88 committee at the national level. Instead, contributions received for Victory '88 were forwarded on to state and local Victory '88 committees.

Committee violated 2 U.S.C. § 432(b)(2).[3]

3. Approve the attached letter, factual and legal analysis, and interrogatories and request for documents to the Republican National Committee.

4. Approve the attached letter and interrogatories and request for documents to Rep. Helen Delich Bentley.

4. Approve the attached letter to James F. Keenan.

Date 2/6/90

Lawrence M. Noble
General Counsel

Attachments
1. Responses
2. Proposed letter, factual and legal analysis and interrogatories and request for documents to the RNC
3. Proposed letter and interrogatories and request for documents to Rep. Bentley
4. Proposed letter to James F. Keenan

Staff Assigned: George F. Rishel
Jeffrey D. Long

2 0 4 0 3 1 2 4 5

3. This finding is made with respect to the forwarding of the $5,000 contribution from the Northwest National Bank Political Action Committee dated October 28, 1988, and payable to Victory '88. The Commission has previously found in this matter that the RNC violated this section with respect to certain contributions it received that were eventually deposited into the Carroll County Republican Central Committee Federal Account. This additional finding will make it clear that the finding includes the $5,000 contribution solicited by Keenan.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2936
James F. Keenan)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 12, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2936:

1. Take no further action against James F. Keenan and close this file with respect to this respondent, as recommended in the General Counsel's report dated February 6, 1990.

2. Find reason to believe the Republican National Committee violated 2 U.S.C. § 432(b)(2).

3. Approve the letter, factual and legal analysis, and interrogatories and request for documents to the Republican National Committee, as recommended in the General Counsel's report dated February 6, 1990.

4. Approve the letter and interrogatories and request for documents to Rep. Helen Delich Bentley, as recommended in the General Counsel's report dated February 6, 1990.

(continued)

2004031-2946

5. Approve the letter to James K.Keenan, as recommended in the General Counsel's report dated February 6, 1990.

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

Attest:

2-12-90
Date

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

Received in the Secretariat: Wednesday, Feb. 7, 1990 10:18 a.m.
Circulated to the Commission: Wednesday, Feb. 7, 1990 4:00 p.m.
Deadline for vote: Friday, Feb. 9, 1990 4:00 p.m.
At the time of deadline, 4 affirmative votes had not been recorded.
Final vote received: Monday, February 12, 1990 at 10:48 a.m.

0 4 0 3 1 1 3 9 4 7

OGC 9570

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 15, 1990

Benjamin L. Ginsberg, Esquire
Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

Dear Mr. Ginsberg:

On February 12, 1990, the Federal Election Commission found that there is reason to believe the Republican National Committee ("Committee") violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. This finding supplements the Commission's previous finding in this matter on August 14, 1989, that there is reason to believe the Committee violated 2 U.S.C. § 432(b)(2).

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee. 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 along with answers to the enclosed questions within 15 days of your 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, 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 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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Questions
Procedures

40311942

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Republican National Committee **MUR:** 2936

This matter was generated based on information ascertained by the Federal Election Commission in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that every person who receives a contribution for a political committee which is not an authorized committee shall, if the amount is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(2). See 11 C.F.R. § 102.8(b).

Baltimore County Victory '88 reported a $5,000 contribution from the Northwest National Bank Political Action Committee ("Northwest National Bank PAC") with a date of January 5, 1989. Northwest National Bank PAC reported this contribution as made on October 28, 1988, to "Victory '88 c/o Mr. James F. Keenan, Pace Industries, Inc., 217 Easy Street, Aiken, SC 29801." Thus, it did not appear this contribution had been forwarded within the 10-day period required by 2 U.S.C. § 432(b)(2).

James Keenan was a member of Team 100 and a supporter of George Bush in the 1988 campaign. He made requests to family members and close associates to assist the Bush campaign. In

2004031950

that regard, he had a conversation with Virginia Morris, president of the Northwest National Bank PAC in Fayetteville, Arkansas,[1] and requested that she joint Team 100 to show her support for Bush. She declined but instead forwarded to him the $5,000 contribution from the PAC made payable to Victory '88. He was not asked by anyone to contact Mrs. Morris, but did so on behalf of Team 100, of which he was an agent.

Mrs. Morris was contacted as an individual by Keenan about whether she would be interested in becoming a member of the "Committee for 100." She declined but advised Keenan that the PAC would make a "general contribution" to Victory '88. Accordingly, the PAC issued a check for $5,000 dated October 28, 1988. This check was mailed to Keenan on October 28 with a cover letter. In that letter Mrs. Morris notes the enclosed contribution "made payable to Victory '88 for you to place where needed and legally eligible." She has further stated:

> ...It was our understanding the contribution would be used as the Victory '88 committee deemed necessary to support Republican candidates. There was not specific instructions and/or discussions concerning where the funds would be placed.

Keenan received this contribution from Mrs. Morris and on the "same or next day" forwarded it to the RNC in care of the Team 100 coordinator. After forwarding the check to the Team 100 headquarters "in early November," he had no further information concerning its ultimate use. No third party requested or

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1. Although Keenan is located in Aiken, South Carolina, Pace Industries is headquartered in Harrison, Arkansas, which is 50 miles east northeast of Fayetteville.

directed that he forward this contribution to Team 100 but that "[i]t seemed the logical thing to do as I was a member of this group, and the check was a result of my request that Virginia Morris join it." Fred Bush was identified as the coordinator of the Team 100 office at the RNC.

Marjorie Neuman, treasurer of Baltimore County Victory '88, received this contribution "on or about January 5, 1989," when it "was handed to me by Congresswoman Helen Delich Bentley...in her Towson District Office...." A copy of a letter accompanied the check. This letter was from Susan Henderson, secretary to James Keenan, addressed to Betsy Tyson at the RNC, and dated November 10, 1988. It states: "[p]er our telephone conversation this morning, I am enclosing the check I mentioned." Baltimore County Victory '88 did not request or solicit this contribution.

As noted, Keenan was part of Team 100 and solicited, received, and forwarded this contribution as part of his efforts for Team 100, a project of the RNC. Thus, Keenan was acting as the agent of the RNC and his action are attributable to it.[2] Therefore, the RNC is responsible for the delay in forwarding this contribution to a Victory '88 committee for deposit.

Accordingly, there is reason to believe the Republican National Committee violated 2 U.S.C. § 432(b)(2) with respect to the forwarding of the $5,000 contribution from Northwest National Bank PAC.

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2. The RNC did not establish a Victory '88 committee at the national level. Instead, Victory '88 contributions that it received were forwarded on to state and local Victory '88 committees.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Republican National Committee
c/o Benjamin L. Ginsberg, Esquire
Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

2340211933

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from October 1, 1989 to present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2 0 4 0 3 1 3 5 4

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

2004031925

**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

A $5,000 contribution dated October 28, 1988, from the Northwest National Bank Political Action Committee of Fayetteville, Arkansas, was reported as made to Victory '88, c/o James F. Keenan of Aiken, South Carolina. It was forwarded to the Republican National Committee on November 10, 1988, with a cover letter addressed to Ms. Betsy Tyson. This check was later delivered on January 5, 1989, by Rep. Helen Delich Bentley to Marjorie J. Neuman, treasurer of Baltimore County Victory '88, which reported its receipt on January 5, 1989.

1. With respect to this check, state how it came about that it was forwarded to Baltimore County Victory '88.

2. State the date you received this check.

3. State the date and the person to whom you forwarded this check.

4. Provide copies of all documents relating to your responses to the above questions and those relating to your handling of this check.

2004031256

OGC9569

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 15, 1990

Benson Everett Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, MD 21201-2978

RE: MUR 2936
Rep. Helen Delich Bentley

Dear Mr. Legg:

On August 22, 1989, your client was notified that the Federal Election Commission had found reason to believe your client violated 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its further investigation of the forwarding of a $5,000 contribution from the Northwest Bank PAC to the Baltimore County Victory '88 committee as part of this matter, the Commission has issued the attached interrogatories and request for documents requesting additional information from your client, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

It is requested that you submit all answers to questions under oath within 15 days of your receipt of this letter.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and Request for Documents

2004081957

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2936
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Rep. Helen Delich Bentley
c/o Benson Everett Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, MD 21201-2978

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

2040319358

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from October 1, 1989 to present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

2304031-259

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

2004031250

**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

A $5,000 contribution dated October 28, 1988, from the Northwest National Bank Political Action Committee of Fayetteville, Arkansas, was reported as made to Victory '88, c/o James F. Keenan of Aiken, South Carolina. It was forwarded to the Republican National Committee on November 10, 1988, with a cover letter addressed to Ms. Betsy Tyson. This check was later delivered on January 5, 1989, by Rep. Helen Delich Bentley to Marjorie J. Neuman, treasurer of Baltimore County Victory '88, which reported its receipt on January 5, 1989.

1. With respect to this check, state how it came about that it was forwarded to Baltimore County Victory '88.

2. State the date you received this check.

3. State the date and the person to whom you forwarded this check.

4. Provide copies of all documents relating to your responses to the above questions and those relating to your handling of this check.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 15, 1990

Charles B. Thomas, Esquire
Thomas, Hirsch & Albert, P.C.
Suite 720
1828 L Street, N.W.
Washington, D.C. 20036

RE: MUR 2936
James F. Keenan

Dear Mr. Thomas:

On November 6, 1989, your client was notified that the Federal Election Commission found reason to believe that he violated 2 U.S.C. § 432(b)(2). On December 14, 1989, you submitted a response to the Commission's reason to believe finding in this matter.

After considering the circumstances of the matter, the Commission determined on February 12, 1990, to take no further action against your client, and closed the file as it pertains to him. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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.

The Commission reminds you that the failure to include the date of receipt when a contribution is forwarded to the treasurer of a political committee appears to be a violation of 2 U.S.C. § 432(b)(2). Your client should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

9004031119 63

OGC5587

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

VIRGINIA OFFICE
SUITE 500
2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAR -5 PM 2:05

February 28, 1990

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

I received Mr. Noble's letter and a new set of Interrogatories on February 21, 1990. Apparently, the long weekend of Washington's Birthday delayed the mails. I hope to file Answers (and produce documents) on or before March 9, 1990. I was, however, tied up in a deposition yesterday and today, and I will be out-of-town Thursday and Friday. As a result, I am getting a late start and may need more time. If so, I will contact you next week. Thank you for your courtesy in this matter.

Very truly yours,

Ben Legg

Benson Everett Legg

BEL:mtm
9903F/36

cc: The Honorable Helen Delich Bentley

90 MAR -5 AM 9:41
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
90 MAR -9 PM 12:44

OGC 5649

Republican National Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
J. Courtney Cunningham
Deputy Chief Counsels

March 7, 1990

90 MAR -9 PM 12:08
RECEIVED
FEDERAL ELECTION COMMISSION

HAND DELIVERED

Ms. Lee Ann Elliott, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 2936
Republican National Committee

Dear Chairman Elliott:

As Counsel for the respondent in the above-captioned matter under review, the undersigned respectfully requests an extension in which to respond to the discovery request from the Commission. As discussed with Jeffrey Long, respondent requests a 20-day extension. Accordingly, respondent requests that its response now be due on March 27, 1990.

This extension is so that the RNC may respond fully to the Commission's request for interrogatories and documents. In order to file a complete response and make the search necessary to supply the requested information, this extension is needed.

Thank you for your consideration.

Sincerely,

Benjamin L. Ginsberg

90 MAR -9 PM 5:08
RECEIVED
FEDERAL ELECTION COMMISSION

BLG:jd

cc: Jeffrey Long, Esq.

06C5660

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

WASHINGTON, D.C. OFFICE
SUITE 1200
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004-1701
(202) 662-4300

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

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2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
TELEX 898032

WRITER'S DIRECT NUMBER IS
244-7404

VIRGINIA OFFICE
SUITE 500
2000 CORPORATE RIDGE
McLEAN, VIRGINIA 22102-7805
(703) 749-3500

ROCKVILLE, MD OFFICE
502 SOVRAN BANK BUILDING
255 NORTH WASHINGTON STREET
P.O. BOX 1906
ROCKVILLE, MD 20850
(301) 340-9700

90 MAR 12 PM 12:39
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

March 6, 1990

BY TELECOPY

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

I had hoped to file Answers to Interrogatories and produce documents by March 9, 1990. Last Thursday, United States District Judge Frederic Smalkin scheduled an expedited preliminary injunction hearing in one of my cases for Wednesday, March 14, 1990. As a result, I will be tied up until the 14th; we are even taking depositions Saturday and Sunday. I, therefore, respectfully request a two week extension of time. If granted, Congresswoman Bentley's Answers would be due on Friday, March 23, 1990. Please advise me whether the extension is acceptable to you. Thank you for your courtesy in this matter.

Very truly yours,

Benson Everett Legg

BEL:mtm
9903F/39

cc: The Honorable Helen Delich Bentley

90 MAR 12 AM 10:49
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1990

Benson Everett Legg, Esquire
Venable, Baetjer and Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, MD 21201-2978

RE: MUR 2936
Rep. Helen Delich Bentley

Dear Mr. Legg:

This is in response to your letter dated March 6, 1990, which we received on March 8, 1990, requesting an extension until March 23, 1990, to respond to the Answers to Interrogatories. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 23, 1990.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2940311257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 13, 1990

Benjamin L. Ginsberg, Esquire
Republican National Committee
310 First Street, SE
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

Dear Mr. Ginsberg:

This is in response to your letter dated March 7, 1990, which we received on March 9, 1990, requesting an extension until March 27, 1990, to respond to the Answers to Interrogatories. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 27, 1990.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2004031958

06-C5769

RECEIVED
FEDERAL ELECTION COMMISSION

90 MAR 26 AM 9:33

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
FAX (301) 244-7742
TELEX 898032

WASHINGTON, D. C.
McLEAN, VA
ROCKVILLE, MD
TOWSON, MD
BEL AIR, MD

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES MCH. HOWARD (1870-1942)

BENSON EVERETT LEGG

WRITER'S DIRECT NUMBER IS
244-7404

March 23, 1990

90 MAR 26 PM 2:25

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

I enclose executed Answers to the Commission's second set of Interrogatories. Attached to the Answers are the documents requested by the Interrogatories. Do not hesitate to call if you need any additional information. Thank you for your courtesy in this matter.

Very truly yours,

Benson Everett Legg

BEL:mtm
Enclosure
9903F/71

cc: The Honorable Helen Delich Bentley

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of *
MUR 2936 *

* * * * * * * * * * * * * * * *

CONGRESSWOMAN BENTLEY'S ANSWERS
TO THE COMMISSION'S SECOND SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Congresswoman Helen Delich Bentley, by Benson Everett Legg, her undersigned attorney, hereby answers the Interrogatories and Request for Production of Documents submitted by the Federal Election Commission on February 15, 1990.

INTERROGATORY NO. 1.

With respect to this check, state how it came about that it was forwarded to Baltimore County Victory '88.

RESPONSE TO INTERROGATORY NO. 1.

In March 1988, Congresswoman Bentley was elected by the Central Committee of the Maryland State Republican Party ("State Party") to a four-year term as Republican National Committeewoman for Maryland. Her term in office began in August of that year.

One of Congresswoman Bentley's duties as National Committeewoman was to assist the Victory '88 Program in Maryland. The Program is part of an ongoing effort to elect

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Republican candidates to local, state and national offices, and to strengthen the Republican Party through voter registration drives and other party-building activities. In Maryland, the Victory '88 Program included the activities of local party committees in addition to the activities of the State Party.

Congresswoman Bentley has no independent recollection or written record of receiving the check in question. She believes that it was hand-delivered to her at a social gathering in Washington, D.C. on or about December 13, 1988. The check would have been delivered to her by someone affiliated with the Republican National Committee ("RNC"), but beyond an impression that the person was Frederick Bush, she cannot recall whom.

As explained in Congresswoman Bentley's Answers to the Commission's first set of Interrogatories, she received several checks from the RNC. The RNC knew that the checks, including the Northwest check, would be deposited into the federal account of a local party committee to help pay for the local party's Victory '88 activities in Maryland. Congresswoman Bentley, who did not solicit the checks, assumed that this disposition was consistent with the donors' intent.

Upon receipt of the Northwest check, Congresswoman Bentley, through a campaign aide, offered the contribution to the Carroll County and the Baltimore City local parties. When they indicated that they had no present need for the funds, Congresswoman Bentley directed the check to the Baltimore

2004031271

County Victory '88 program. On or about January 3, 1989, the check was given to Marjorie Neuman, the Treasurer of the Baltimore County federal account. It is Congresswoman Bentley's understanding that Mrs. Neuman deposited the check the same day.

INTERROGATORY NO. 2.

State the date you received this check.

RESPONSE TO INTERROGATORY NO. 2.

See Answer to Interrogatory No. 1.

INTERROGATORY NO. 3.

State the date and the person to whom you forwarded this check.

RESPONSE TO INTERROGATORY NO. 3.

See Answer to Interrogatory No. 1.

INTERROGATORY NO. 4.

Provide copies of all documents relating to your responses to the above questions and those relating to your handling of this check.

RESPONSE TO INTERROGATORY NO. 4.

Document attached.

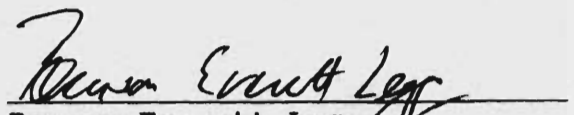
I hereby declare and affirm under the penalties of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Helen Delich Bentley

Helen Delich Bentley

20040819972

Respectfully submitted,



Benson Everett Legg
Venable, Baetjer and Howard
1800 Mercantile Bank and
Trust Building
Two Hopkins Plaza
Baltimore, Maryland 21201
(301) 244-7404

Attorney for Congresswoman
Helen Delich Bentley

)))40311973

1934M

Northwest National Political Action Committee
P. O. [redacted] 1407
Fayetteville, Arkansas 72702 [redacted]

October 28 19 88 81-139/829

PAY TO THE ORDER OF Victory 88 $*5000.00*

Five thousand and no/100 ---------- DOLLARS

NORTHWEST NATIONAL BANK
FAYETTEVILLE, ARKANSAS 72701

X _____

MEMO _____ Virginia T. Morris

:082901392: 000207631108

	DOLLARS	CENTS
TOTAL FOR'D		
DEPOSIT/ CREDIT		
TOTAL		
THIS PAYMENT		
OTHER DEDUCTIONS		
BAL FOR'D		

KISNER & ASSOCIATES, PC
1010 VERMONT AVE., N.W., NO. 1120
WASHINGTON, D.C. 20005

1054

October 21 19 88 15-157/540

PAY TO THE ORDER OF Victory '88 $ 550.00

Fifty five hundred ~~THE SUM 55 DOLS 00 CTS~~ 00/100 DOLLARS

FEDERAL CITY NATIONAL BANK
Washington, D.C. 20001

FOR _____ Gerald B. Kisner

⑈001054⑈ :054001576: ⑈01 009907 01⑈

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mailed to ~~Steve Herzberger~~ 12-14-88

~~David Bloomberg~~ 12-19-88

Margie Neuman 1-03-89

(over)

217 Easy Street
Aiken, SC 29801

November 10, 1988

Ms. Betsy Tyson
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, Southeast
Washington, D.C. 20003

Dear Betsy:

Per our telephone conversation this morning, I am enclosing the check I mentioned.

I certainly appreciate all your assistance, and look forward to meeting you this winter.

Sincerely,

Susan

Susan Henderson
Secretary to Mr. and Mrs.
James F. Keenan

Encl.

C00408119775

9 0 0 4 0 8 1 1 9 7 6

NO _____ $ _____

_____ 19 ____

TO _____

	DOLLARS	CENTS
BAL. FOR'D		
DEPOSIT/ CREDIT		
-		
TOTAL		
THIS PAYMENT		
OTHER DEDUCTIONS		
BAL. FOR'D		

LCJ-1 9-87

Northwest National Political Action Committee
P. O. Box 1407
Fayetteville, Arkansas 72702

NUMBER _____

October 28 19 88 81-138/829

PAY TO THE ORDER OF Victory 88 $*5000.00*

Five thousand and no/100 ---------- DOLLARS

NORTHWEST NATIONAL BANK
FAYETTEVILLE, ARKANSAS 72703

X _____

MEMO _____

Virginia T. Morris

⑆082901392⑆ 000207631⑈01

06C5789

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
90 MAR 27 PM 4:39

Republican
National
Committee

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
J. Courtney Cunningham
Deputy Chief Counsels

RECEIVED
FEDERAL ELECTION COMMISSION
90 MAR 28 PM 12:09

March 27, 1990

Lee Ann Elliot, Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2936

Dear Chairman Elliot:

Respondents in the above-captioned matter enclose herewith their Response to Interrogatories and Request for Production of Documents, with accompanying affidavit. A thorough review of the files, and interviews of current and former employees of the Republican National Committee (RNC), have not yielded information concerning the RNC's receipt of the check in question and its forwarding.

RECEIVED
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The affidavits appended to the RNC's October 6, 1989 Response to the Commission's Interrogatories and Request for Production of Documents in this MUR detail the RNC's policies and procedures for forwarding checks intended for state and local Victory '88 Committees. However, no records nor independent recollection of this check nor the circumstances under which it may have been forwarded to Baltimore County Victory '88 can be located.

Since the RNC can find no evidence of this transaction, nor any independent recollection of the transaction, the RNC cannot refute the Commission's Factual and Legal Analysis, nor its finding of reason to believe that the RNC failed to forward the check in question in a timely manner. It appears that this failure was inadvertent, and since the RNC cannot prove or disprove the Commission's Analysis, the RNC believes that pre-probable cause conciliation under 11 C.F.R. 111.18(d) would be appropriate.

Dwight D. Eisenhower Republican Center • 310 First Street Southeast • Washington, D.C. 20003 • (202) 863-8638
Telex: 701144 • FAX: 863-8820

Accordingly, the RNC respectfully requests that the Commission agree to enter into conciliation prior to any finding of probable cause.

Thank you for your consideration.

Sincerely,

Benjamin L. Ginsberg

Enclosures

cc: Jeffrey Long, Esq.

40311978

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2936

RESPONSE TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Benjamin L. Ginsberg hereby answers the Federal Election Commission's Interrogatories and Request for Production of Documents, issued in this matter on February 15, 1990, as follows:

1. With respect to this check, state how it came about that it was forwarded to Baltimore County Victory '88.

RESPONSE: A detailed description of the Republican National Committee's (RNC) participation in the nationwide Victory '88 program is contained in the RNC's October 6, 1989 Response to the Commission's Interrogatories and Request for Production of Documents in this MUR. With respect to the particular check in question, the RNC has been unable to determine the circumstances under which it was forwarded to Baltimore County Victory '88.

2. State the date you received this check.

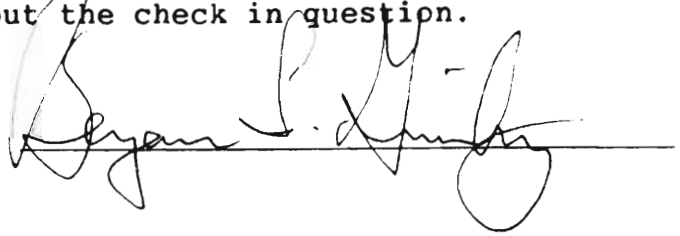
RESPONSE: No responsive information can be located regarding this check.

3. State the date and the person to whom you forwarded this check.

RESPONSE: The affidavits appended to the RNC's October 6, 1989 Response to the Commission's Interrogatories and Request for Production of Documents in this MUR detail the RNC's policies and procedures for forwarding checks intended for state and local Victory '88 Committees. However, no records nor independent recollection of this check nor the circumstances under which it may have been forwarded to Baltimore County Victory '88 appear to exist.

4. Provide copies of all documents relating to your responses to the above questions and those relating to your handling of this check.

RESPONSE: With the exception of the appended affidavit, no supporting documentation can be located. The affidavit of Frederick M. Bush [Exhibit A], whose connection to this MUR is suggested on page 3 of the Commission's Factual and Legal Analysis, underscores the RNC's lack of information about the check in question.



BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF FREDERICK M. BUSH

Frederick M. Bush, having been duly sworn, deposes and says:

1. I reside at 8208 Kerry Road, in the City of Chevy Chase, and State of Maryland.

2. I am aware of the nature of the issues raised by the above-referenced MUR. During part of the period at issue, I directed the Victory '88 finance program as a consultant to the Republican National Committee. I was not, as the Commission's Factual and Legal Analysis indicates (p.3) "the coordinator of the Team 100 office at the RNC."

3. I have no independent recollection of the check at issue in this MUR, nor of the circumstances surrounding its solicitation, contribution, or eventual deposit.

4. To the best of my recollection, I never handled the check in question.

5. I have never made the acquaintance of Mr. James F. Keenan, nor had any discussion or correspondence with him concerning the check in question. Furthermore, I have no knowledge or information about the Northwest National Bank Political Action Committee, nor any contributions made by it.

6. It was the policy of the RNC Victory '88 finance program to routinely process all checks made payable to Victory '88 as soon as they were received, in order to comply with the requirements of federal law. I have no recollection of any circumstances which would account for the delay in the deposit of the check.

In witness whereof, I have hereunto set my hand and seal on this 26th day of March, 1990.

F. M. B.

Frederick M. Bush

Subscribed and sworn to before me
this 26th day of March, 1990.

Philip A. Guarino

My Commission Expires June 14, 1991

BEFORE THE FEDERAL ELECTION COMMISSION
MUR 2936

AFFIDAVIT OF MICHAEL A. HESS

Michael A. Hess, having been duly sworn, deposes and says:

1. I reside at Quince Hill Farm, in the Village of Kearneysville, and State of West Virginia.

2. I am aware of the nature of the issues raised by the above-referenced MUR. At all times relevant to this MUR, I have served as Deputy Chief Counsel to the Republican National Committee (RNC).

3. In the course of assisting the RNC in preparing a response in this MUR, I personally undertook a review of all documents relevant to the transaction under review. This included documents in the custody of the Legal, Finance, and Political Divisions of the RNC. I also conducted both personal and telephone interviews with all current or former employees of the RNC who might have had personal knowledge of the transaction under review.

4. Neither the document search nor the interviews mentioned above yielded any relevant information, except to the extent in the RNC's Response to Interrogatories and Request for Production of Documents, and accompanying affidavit of Frederick M. Bush.

In witness whereof, I have hereunto set my hand and seal on this 27th day of March, 1990.

Michael A. Hess

Subscribed and sworn to before me
this 27th day of March, 1990.

Philip A. Guarino

My Commission Expires June 14, 1991

OBC 7022

STATE OF MARYLAND

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 21 AM 9:40

EPHEN MONTANARELLI
STATE PROSECUTOR

SUITE 100
ONE INVESTMENT PLACE
TOWSON, MARYLAND 21204-4120
TELEPHONE:
(301) 321-4067

OFFICE OF
THE STATE PROSECUTOR

July 18, 1990

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Pre-MUR 217
(MUR 2936)

90 JUL 23 PM 4:29

Dear Mr. Noble,

In April of this year, our Office received a request for an investigation from several members of a political organization known as the Carroll County Republican Central Committee. These individuals described the circumstances surrounding the receipt and alteration of certain checks, made payable to "Victory 88" which were ultimately deposited into a bank account bearing the name of the Carroll County Republican Central Committee. They asked our Office to determine whether any Maryland State laws had been violated.

It has come to our attention that your office has also investigated possible federal election law violations based on these same acts.

Corporal Ben Hurdle, Maryland State Police, has been in contact by phone with Jeff Long of your office. Mr. Long advised that your office has completed an extensive investigation and has contacted and obtained statements from the persons who made the campaign contributions which are the focus of our inquiry. This information, obtained closer in time to the acts in question, would obviously be of great assistance to this Office.

This Office would therefore request a copy of the General Counsel's report on it's investigation of this matter. Be assured that any information obtained by this Office is kept confidential and would only be disclosed if the investigation resulted in litigation.

Should you require any additional information, you may contact me or Corporal Ben Hurdle at (301) 321-4067.

Very truly yours,

Dolores O. Ridgell

DOLORES O. RIDGELL
Assistant State Prosecutor

DOR:daa

2004031193

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FEDERAL ELECTION COMMISSION
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

August 8, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: Request for Information in MUR 2936

On July 23, 1990, this Office received a letter from Dolores O. Ridgell, assistant state prosecutor, of the Office of The State Prosecutor in Towson, Maryland. The letter stated that the State Prosecutor's office had been requested to investigate the Carroll County Republican Central Committee regarding its receipt and alteration of certain checks, made payable to Victory '88, which were deposited into the county committee's account in order to determine if any Maryland laws had been violated.

The letter makes further reference to the Commission's on-going enforcement matter regarding the Carroll County Republican Central Committee and many of these same checks, now MUR 2936. The letter requests a copy of the General Counsel's report on our investigation to assist the Maryland State Prosecutor's office in its investigation. The letter adds that any information obtained by the State Prosecutor's office would be kept confidential and not disclosed unless the investigation resulted in litigation.

In MUR 2936, the Carroll County Republican Central Committee, as a respondent as well as the sua sponte submitter of the matter to the Commission, waived confidentiality in a letter received September 18, 1989. The Commission acknowledged this waiver in a letter that cautioned the Carroll County Republican Central Committee that such waiver only applied to itself and not to other respondents or issues. No other respondents have notified the Commission of any waiver of confidentiality. Therefore, the confidentiality provisions of the Act still apply with respect to the other respondents in this matter.

This Office remains hopeful that this matter may be concluded in the near future and that the matter then be placed on the public record. Until that time, however, we would not recommend that any information obtained as part of the

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Commission's investigation be released at this time to the Office of The State Prosecutor. Instead, we recommend that the Commission deny the request for information and to send the attached letter.

RECOMMENDATIONS

1. Deny the request of the Office of The State Prosecutor for the State of Maryland for information obtained as part of the investigation in MUR 2936.

2. Approve the attached letter

Attachments
1. Request
2. Proposed Response

Staff persons: George F. Rishel
Jeffrey D. Long

2 1 0 4 0 3 1 1 9 3 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2936
Carroll County Republican Central Committee - Request for information.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 10, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2936:

1. Deny the request of the Office of the State Prosecutor for the State of Maryland for information obtained as part of the investigation in MUR 2936.

2. Approve the letter, as recommended in the General Counsel's Memorandum dated August 8, 1990.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did cast a vote.

Attest:

8-13-90
Date

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

Received in the Secretariat: Wed., August 8, 1990 10:13 a.m.
Circulated to the Commission: Wed., August 8, 1990 4:00 p.m.
Deadline for vote: Fri., August 10, 1990 4:00 p.m.

2004031-19836

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1990

Dolores O. Ridgell
Assistant State Prosecutor
Office of The State Prosecutor
One Investment Place, Suite 100
Towson, MD 21204-4120

RE: MUR 2936

Dear Ms. Ridgell:

This is in response to your letter dated July 18, 1990, in which you requested information pertaining to the above-referenced enforcement matter.

The Federal Election Campaign Act of 1971, as amended ("the Act") prohibits any person from making public the fact of any notification or investigation by the Commission, prior to closing the file in the matter, unless the party being investigated has agreed in writing that the matter be made public. See 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A). Although the Carroll County Republican Central Committee has waived its right to confidentiality, no other respondents in this matter have made such a waiver. Therefore, because of the confidentiality requirements that attach to the other respondents, the Commission, on August 10, 1990, decided it was not in a position to release any information at this time.

We will notify you as soon as the Commission takes final action and closes the file in this matter. At that time, the information you requested will become part of the public record and can be released to you.

Sincerely,

Lawrence M. Noble
General Counsel

2934011937

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee Federal Account	)	
	)	
Rep. Helen Delich Bentley	)	MUR 2936
	)	
Richard P. Taylor	)	
	)	
Republican National Committee	)	
	)	
Gary W. Bauer	)	

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SECRETARIAT
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GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was initiated by a sua sponte submission filed on May 30, 1989, and supplemented on July 10, 1989, by Louis E. Wiser, Jr., treasurer of the Carroll County Republican Central Committee Federal Account ("Carroll County Federal Account" or "Federal Account"), in which he requested a review of the Federal Account's records, reports, and activities for 1988 and 1989, when Respondent Gary W. Bauer was treasurer of the Federal Account. The sua sponte submission had been authorized by a vote of the Carroll County Republican Central Committee.

On August 14, 1989, the Commission found reason to believe that: (1) the Federal Account violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a); (2) Gary W. Bauer violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d); and (3) Helen Delich Bentley, Richard P. Taylor, and the Republican National Committee violated 2 U.S.C. § 432(b)(2). The findings related to (1) the recordkeeping and

reporting of 24 contributions totaling $14,700, particularly as to their date of receipt and the occupation or employer of the contributor and (2) the timely forwarding and deposit of 14 of these contributions (totaling $6,550). The Commission also approved interrogatories and requests for documents to Respondents Bauer, Bentley, Taylor, and the Republican National Committee and to nonrespondent witnesses Sharon Hornberger, Daniel Oliver, Ann Dore McLaughlin, Shaukat A. Ashai, Tariq Mahmood, Parvez Shah, and Jayne H. Plank. Responses to these interrogatories and request for documents have been received from all respondents and all of the witnesses, except Ashai and Shah and are attached. See Attachments 1 to 9.[1] Although Ashai and Shah did not respond to the Commission's request, counsel for Rep. Bentley informed staff of this Office that he had obtained statements from them and, at our request, submitted these statements on February 9, 1990. See Attachment 10.

On September 18, 1989, Louis E. Wiser, Jr., on behalf of the Federal Account, submitted a request for preprobable cause conciliation, a waiver of confidentiality, and information on the occupation and employer of 20 contributors. On October 3, 1989, the Commission declined to enter into preprobable cause conciliation at this time until the investigation is completed and responded to the waiver of confidentiality by a letter

1. Because some of the responses are voluminous, only the relevant portions are reproduced as attachments with insert sheets noting what portions have not been reproduced. The full responses are available for review in the docket section of this Office.

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approved on October 18, 1989. In a separate portion of this matter, the Commission on October 17, 1989, found reason to believe James F. Keenan had violated 2 U.S.C. § 432(b)(2) with respect to a $5,000 contribution from Northwest National Bank PAC of Fayetteville, Arkansas, that was received by the Baltimore County Victory '88 committee. After further investigation, on February 12, 1990, the Commission decided to take no further action against Keenan and, instead, found reason to believe the Republican National Committee ("RNC") had violated 2 U.S.C. § 432(b)(2) with respect to this contribution. The RNC responded on March 27, 1990, and Rep. Bentley responded on March 25, 1990. The RNC requested preprobable cause conciliation in this matter in its March 27, 1990, response.

This report reviews the investigation on all outstanding issues. It proposes entering into preprobable cause conciliation with Gary W. Bauer, the Federal Account's former treasurer, and with the RNC.[2] This report also recommends that the Commission take no further action with respect to the Federal Account itself, Richard Taylor, and Rep. Helen Delich Bentley and close the file with respect to them.

II. FACTUAL AND LEGAL ANALYSIS

As noted, this matter involves the 24 contributions received by the Carroll County Republican Central Committee Federal

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2. Gary W. Bauer's response was received on September 28, 1989. In preparing this report, it was discovered that he had also requested preprobable cause conciliation. Because of an oversight, this request has not been previously presented to the Commission.

Account as part of the Republican Party's Victory '88 program. Therefore, this report will first discuss the national Victory '88 program, the Maryland Victory '88 program, and the use of the Carroll County Federal Account. It then addresses the forwarding issue, the altered checks, and the recordkeeping and reporting issues. Next, it covers the results of the investigation regarding the $5,000 contribution from Northwest National Bank PAC. Finally, it discusses the proposed conciliation with Bauer and the RNC.

A. The National Victory '88 Program

The response by the Republican National Committee ("RNC") was made by an affidavit signed by Mary Matalin, chief of staff of the RNC and previously director of the Victory '88 program. With respect to Victory '88, she states:

> Victory '88 was a nationwide program of the Republican National Committee (RNC) that assisted state and local party organizations with their efforts to provide volunteer support on behalf of the entire Republican ticket in the 1988 November general election. Victory '88 was conducted under the direction of the RNC Chairman and staff as a party building program benefiting all Republican candidates by promoting the volunteer-intensive activities set forth in 2 U.S.C. § 431(8)(B)(v), (x) and (xi). While Victory '88 certainly consulted with Republican campaigns, including Bush/Quayle, Victory '88 was separate from any and all campaigns.
>
> The nationwide Victory '88 program assisted state parties in raising funds for both their federal and state accounts and provided advice on the non-allocable party building programs that could be conducted pursuant to the Act.

The response included copies of advice provided by the RNC's previous general counsel to state and local parties regarding Victory '88 activities, fundraising, and the operation of federal

or Victory '88 accounts. Ms. Matalin notes that approximately 425 employees at the RNC were involved operationally with the Victory '88 program. It was conducted under the general leadership of RNC Chairman Frank J. Fahrenkopf, Jr., and Ms. Matalin herself. Fundraising advice and assistance was provided by Fred Bush and Margaret Alexander.

Furthermore, in this regard, Ms. Matalin states that the RNC sent two fundraising mailings to all 50 states and the District of Columbia. One mailing was signed by then-Vice President George Bush and the other by then-President Ronald Reagan. Copies of these mailings and their enclosures were also provided in the response. She notes that the lists for each mailing were prepared by the individual state parties from among their own donors and from lists of contributors to the Bush '88 campaign in that state. All responses were to be sent directly to the state party using an envelope included in the mailing.[3] She adds that RNC personnel were active in the design and production of these mailings but that the state parties reimbursed the RNC for the postage costs for the mailings to their respective states.[4] She said that these two mailings were the only mail solicitations by the RNC on behalf of Victory '88.

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3. The sample mailing with a return envelope for Maryland indicates that these responses were addressed to the state party's Victory '88 account in Annapolis. The mailing also asked that checks be made payable to "Victory '88--Maryland Republican Party."

4. She has included in her response the invoices to the Maryland Republican Party for the postage costs for the two mailings and the copies of the reimbursements by the state party.

Ms. Matalin states that the policy of the RNC was that when donors called the RNC with offers of financial help for Victory '88, they were handled in one of several ways: (1) if donors wanted to contribute to their own state's Victory '88, they were given the appropriate address; (2) if they did not necessarily wish to contribute to their own state's Victory '88 but to where their funds would be better utilized, they were given the appropriate information;[5] or (3) when checks made out to Victory '88 were sent to the RNC, an attempt was made to contact the contributor to determine where it should go and, if the contributor could not be reached, then to the state party of the contributor's home state.[6] The RNC did not establish or register a Victory '88 committee at the national level for the deposit of checks. Instead, as Ms. Matalin points out, the checks themselves were apparently sent on to various state parties or others.

She adds that the RNC's policy was to routinely process all checks received for the Victory '88 program as soon as possible. She states that the RNC did not keep records of all such contributions because the mailings were designed for responses to go directly to the state parties. In the case of any check made

5. She adds that members of the Victory '88 finance staff were instructed to have all checks made out to a particular state's Republican Party in care of that state's Victory '88 account. She said they were further told to tell donors not to make checks out simply to Victory '88.

6. She added that contributors from the District of Columbia who sent checks to the RNC made out to Victory '88 were contacted and asked to which state party they wished their checks directed.

payable to Victory '88 that came in unsolicited and which could not be attributed to one of the two mailings and where the donor could not be contacted, the checks were deposited into an RNC account.

B. Victory '88 in Maryland

With regard to Maryland, Ms. Matalin states that as part of the Victory '88 party building program in all states, there was coordination and discussion with local officials and personnel of various party organizations and the Bush/Quayle campaign as well as with other campaigns on the federal, state, and local levels. She states that Victory '88's role was to advise and assist the Republican State Committee of Maryland "as well as other Republican Party organizations in the state" in establishing and operating their party building programs. She states that this advice and assistance included helping raise funds through the mail solicitations and through fundraising events. In addition, she notes that funds were transferred to the Maryland Party and to Free State Victory '88 by the RNC pursuant to 11 C.F.R. § 110.3(c).

She notes that there were frequent meetings and telephone calls between July 1, 1988, and Election Day between RNC staff and state and local party and campaign officials. She adds that there "was frequent contact with both Representative Helen Delich Bentley, RNC National Committeewoman and Maryland Bush/Quayle chairman, and Richard P. Taylor, RNC National Committeeman and

Victory '88 treasurer for Maryland."[7] She further notes that specific liaison with "Republican operatives and entities in Maryland" was handled primarily by several persons. Later in her affidavit, she states that any activities between the RNC and individuals in Maryland were handled either directly by Fred Bush or by Tom Labrecque working with Helen Bentley, Richard Taylor, and Dan Fleming (the state party chairman).

During the period in question, Richard Taylor was the Republican National Committeeman for Maryland, finance chairman for Maryland Victory '88, and finance chairman for Maryland Bush/Quayle. He states that every contribution he received during the 1988 general election in Maryland was for Victory '88. He says that all of these contributions, except for 15, were forwarded to the Republican State Central Committee of Maryland. The other 15, totaling $11,050 were received and "turned over by hand to Congresswoman Helen Bentley for deposit in the Free State Victory '88 Account (set up by the Baltimore City Republican Central Committee)." He said he did so with his understanding of the wishes of the contributors. Thirteen of these 15, totaling $6,050, are involved in this matter relating to the forwarding issue. He adds that to his knowledge Bush/Quayle '88 "had no role in the soliciting, receipt, deposit, and disbursement of the contributions made by the persons on the list involved."

Rep. Helen Delich Bentley was Republican National

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7. Taylor was finance chairman for Maryland Victory '88. He is not listed on the Statement of Organization of the state party's federal account as the treasurer or assistant treasurer, though he states he is a signatory on the state party's bank account(s).

Committeewoman for Maryland and chairman of Bush/Quayle '88 in Maryland. She participated in the strategy and operation of the Victory '88 program in Maryland, including the raising and expenditure of funds. During the fall campaign, she organized several fundraising and party-building events and activities as part of Maryland Victory '88. She was responsible for various Victory '88 activities including a statewide voter registration drive and a GOTV telephone bank. She also participated in several fundraising events on behalf of Victory '88. The proceeds of these events went to various Victory '88 programs. Some of the proceeds were solicited by Congresswoman Bentley "with the understanding she would direct the funds as she considered appropriate." Accordingly, she directed some of the contributions to the state party's fund and others to local party accounts. She also personally solicited approximately 25 contributions to Victory '88 with the understanding she would have discretion to direct and expend the funds as she considered appropriate.

She did not raise money for Bush/Quayle '88 during the relevant period, and it did not play any role in the solicitation, receipt, deposit, or disbursements of the contributions in this matter. She adds that she was dissatisfied with the performance of the state party's Victory '88 program, especially after the "Willie Horton" mass mailing. Therefore, she solicited contributions with the understanding they would be used for Victory '88 activities she approved of. Most of those contributions went to either the Carroll County Republican

Central Committee Federal Account or to Free State Victory '88.

Reports filed with the Commission disclose that the Republican State Central Committee of Maryland's federal account raised $303,392.34 and disbursed $295,493.49 in 1988. Free State Victory '88 raised $70,123.00 and disbursed $68,171.21 in 1988, nearly all of which was disclosed in the 1988 Post General Election Report.[8]

C. Carroll County Republican Central Committee Federal Account

Richard Taylor states that in March 1988 he contacted Sharon Hornberger, the chairman of the Carroll County Republican Central Committee, to ascertain whether the county party maintained a federal account. He said this contact was one of several similar contacts with other county party organizations in Maryland. He says these contacts "were for the purpose of determining the

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8. The disbursements by Free State Victory '88 have themselves drawn media attention. News articles in both the Washington Post and the Baltimore Sun noted the payment of approximately $17,500 to local Democratic clubs in Baltimore. The articles pointed out that these clubs apparently distributed a slate card under the title "Democrats for Bush" that listed George Bush for President along with the Democratic candidates for the U.S. Senate and House. In response to a letter from the Reports Analysis Division, Free State provided a sample slate card entitled "Democrats for Bush" that listed Bush and the Republican candidates for the Senate and House.

The Act's slate card exemption applies to payments by a state or local party committee for a slate card that lists three or more candidates for any public office. 2 U.S.C. § 431(8)(B)(iv). It does not require the candidates to be nominees of the party paying for the slate card. In this regard, this exemption differs from the one for campaign materials distributed by volunteers, which applies to volunteer activities on behalf of nominees of the party making the payments. 2 U.S.C. § 431(8)(B)(viii). Thus, to the extent that Free State Victory '88 paid for slate cards that listed Democratic candidates as well as George Bush, such payments would still qualify for the slate card exemption.

existence of all such accounts which might be available both to raise and disburse that county's Victory '88 contributions (the main purpose of the contact) and as a possible supplement to the basic state party account for contributors supporting the presidential campaign but not necessarily the state party." He adds that he did not request that the Carroll County Federal Account be made available for the deposit and disbursement of contributions in connection with the Victory '88 program or the Bush/Quayle campaign. He also states that he did not direct the disbursement of any funds from the Carroll County Federal Account or from any other federal account in the state except for the state party account where his signature was required. He adds that it was his "assumption that the funds I turned over to Mrs. Bentley were going to be deposited in the Free State Victory '88 Account."

Rep. Bentley states that she also did not request that the Carroll County Federal Account be made available for the deposit and disbursement of contributions to the Bush/Quayle '88 campaign. She does acknowledge, however, that on or about October 19, 1988, she asked Sharon Hornberger if the Carroll County Federal Account "could be used for the receipt and disbursement of donations to Victory '88." She said she informed Ms. Hornberger that she and Richard Taylor were raising money for the Victory '88 program and that they would decide the affiliated account into which the funds would be deposited.

Rep. Bentley further adds that she requested Ms. Hornberger to inform only those members of the central committee who had

supported George Bush for president in the primary campaign because of the lack of a demonstrated commitment from members of the central committee who had supported other candidates in the primary. She says she also, "for strategic reasons," did not want the Dukakis campaign to learn of the account "outside of the normal FEC reporting process." Rep. Bentley states that she delivered three groups of checks to Ms. Hornberger for deposit in the Federal Account. These deliveries were made on October 28, November 1, and November 10, 1988.

Rep. Bentley further states that she presented a number of bills to Ms. Hornberger to be paid from funds deposited into the Federal Account. These bills totaled $18,872.18 and included payments for expenses related to fundraisers, computer services, the inauguration, and certain mailings as well as a $1,000 contribution to Rep. Bentley's campaign and $10,000 in transfers to the federal accounts of the Baltimore City and Baltimore County central committees (Baltimore County Victory '88 and Free State Victory '88).

Sharon Hornberger states that the Carroll County Federal Account was established in January 1988 for the sole purpose of raising and expending funds on behalf of federal candidates in 1988. The first funds of $1,090.95 were raised at a straw poll rally in January and placed in the account.[9] She adds that the account was structured to allow for deposits from various Victory

9. Local party committees do not qualify as political committees for registration and reporting purposes until they have received more than $5,000 in contributions. 2 U.S.C. § 431(4)(C).

'88 committees as the sole account used as a repository for funds raised by the various committees on behalf of all Republican candidates standing for election in 1988 in Carroll County. The treasurer was to maintain records to account for these various monies.

She says that in March 1988 she was approached at the state convention by Richard Taylor, who asked if the county had a federal account. She recalls some comment at the time about checks from outside the county and inquired whether accepting such checks would be permissible. She says Taylor assured her that it would be and that this practice had been used in 1980 and 1984. Ms. Hornberger said she recalls no other discussion about the Federal Account until October 19, 1988, when Rep. Bentley called her and inquired about the existence of the Federal Account. She states Rep. Bentley informed her that Rep. Bentley and Richard Taylor were raising funds and wanted to deposit them into accounts close to headquarters because there was a need for "one (1) day turnaround time on checks."

She adds that Rep. Bentley did not want her to discuss the proposed use of the Federal Account with other central committee members, except on a "need-to-know basis in order to keep the Dukakis forces from being able to trace Bush funds." Instead, Ms. Hornberger says Rep. Bentley asked that only people involved in the Bush campaign be informed. Ms. Hornberger checked with Gary Bauer, then the treasurer of the Federal Account, who indicated that the proposed use of the account would not be a problem for him.

Ms. Hornberger states that the following week Rep. Bentley called her and asked her to pick up some checks. When Ms. Hornberger arrived at Rep. Bentley's home, an aide named Sandy Morgan was copying the checks. Ms. Hornberger said she examined the checks for "several seconds," noting the names, addresses, and dates, but she does not now recall how many checks she received or the names on them. She says she took them directly to Gary Bauer. She indicates that she was again called to Rep. Bentley's house on October 28[10] to pick up more checks in a sealed envelope, which she again delivered to Bauer. She adds that Rep. Bentley directed the disbursement of these funds from the Federal Account on behalf of the Maryland Bush/Quayle campaign.

Gary Bauer states that the Federal Account "served as a means to pay expenses for the Bush/Quayle campaign in Maryland." He says that monies raised by the Victory '88 program and the Bush/Quayle campaign were placed in the account and that he disbursed funds either after receiving an invoice or by verbal instruction from Rep. Bentley through Sharon Hornberger. He identifies $19,900 received and deposited into the Federal

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10. There is some confusion on the dates that Ms. Hornberger received checks from Rep. Bentley prior to the election. Ms. Hornberger states that the first time she picked up checks was on the Tuesday or Friday following the October 19th phone call, which would be the 25th or the 28th. She then states that her second pickup was on the 28th. Rep. Bentley, however, states that she delivered checks to Ms. Hornberger on October 28th and November 1st. Gary Bauer indicates in his response that he received checks from Sharon Hornberger on October 28 and November 2. These dates correlate with the deposit slips for the Federal Account. Thus, the weight of the evidence points toward the delivery of checks from Rep. Bentley to Ms. Hornberger on October 28th and November 1st.

Account for Victory '88 or Bush/Quayle purposes. He notes that he received the checks from Sharon Hornberger, who he understood had received them from Rep. Bentley. He indicates he received checks on October 28 and November 2. He also provided copies of the deposit slips and copies of the checks represented by these deposit slips. These documents show a $4,114.50 deposit slip dated October 29, 1988, a $1,000 deposit slip dated November 2, 1988, a $8,300 deposit slip also dated November 2, 1988, and a $7,500 deposit slip dated November 14, 1988. Copies of the bank statements for the Federal Account show these deposits as being made on October 31, November 2 (two deposits), and November 14. All of the contributions and checks at issue in this matter are represented in these four deposits.

D. Forwarding of Contribution Checks

As noted, the Commission has made findings that there is reason to believe the Republican National Committee, Richard P. Taylor, and Rep. Helen Delich Bentley violated 2 U.S.C. § 432(b)(2) with regard to the untimely forwarding of contributions. There are 14 contributions totaling $6,550 at issue here.

Section 432(b)(2) provides that "[e]very person who receives a contribution for a political committee which is not an authorized committee shall...(B) if the amount of the contribution is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no

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later than 10 days after receiving the contribution."[11] Commission regulations further explain that if the contribution is in excess of $200, such person shall also provide the identification (as defined by 11 C.F.R. § 100.12) of the contributor. The regulation further explains that the date of receipt is the date such person obtains possession of the contribution. 11 C.F.R. § 102.8(b)(2).

As the language of the section makes clear, this provision can be violated by failing to forward a contribution (1) to the treasurer of a political committee (2) within 10 days (3) along with the name and address of the contributor and the date of receipt. As noted, this section contemplates that the person who receives a contribution for a political committee will forward it to the treasurer of the political committee. The purpose of the provision clearly is to insure that contributions reach the treasurer in a short period of time so that the treasurer can properly discharge his or her responsibility to accurately and timely report all contributions for the appropriate period.

The section does not appear to contemplate that a

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11. This provision was first added to the United States Code with the Federal Corrupt Practices Act of 1925, 43 Stat. 1053, 1070, codified at 2 U.S.C. § 243. That provision read:

> Every person who receives a contribution for a political committee shall, on demand of the treasurer, and in any event within five days after the receipt of such contribution, render to the treasurer a detailed account thereof, including the name and address of the person making such contribution, and the date on which received.

This section and its companion sections were among those at issue in United States v. Burroughs, 65 F.2d 796 (D.C. Cir. 1933), affirmed in part, Burroughs v. U.S., 290 U.S. 534 (1934).

contribution for a political committee will be passed to several intermediaries en route to the treasurer (i.e. from A to B to C, etc., to the treasurer), or that each intermediary has a separate 10 days in which to forward the contribution. Instead, it appears to contemplate that the first person who receives a contribution for a political committee bears the responsibility to see it is forwarded it to the treasurer of such committee within 10 days. Therefore, the facts of this matter are examined with reference to this interpretation of Section 432(b)(2).

In this particular matter, the fourteen contributions involved in the forwarding issue were received by several different persons and passed through other intermediaries before reaching the treasurer of the Federal Account. Moreover, the checks were not made payable to any particular committee but were made payable only to Victory '88, which was not an identifiable political committee but a general term encompassing a number of activities, committees, and fundraising events. Thus, the checks made payable only to Victory '88 were not clearly designated as contributions to any specific political committee and could have legally been forwarded to any number of committees. This ambiguity obviously complicates the application of the forwarding provision in that volunteers soliciting and receiving such contributions would not necessarily know to which treasurer they should be sent and would instead reasonably give them to someone likely to know where they should go, such as Richard Taylor, finance chairman for Maryland Victory '88. Therefore, the question is whether the checks were sent to the treasurer of any

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federal political committee that could legally deposit them within 10 days.

For purposes of better understanding how these contributions were raised and forwarded, they are divided into four groups: (1) those Taylor and Rep. Bentley received from the Republican National Committee; (2) those they received from Melvin Bilal; (3) those they received from Gregory Barnhill; and (4) others. Bilal and Barnhill are volunteers who apparently raised contributions for Victory '88, apparently at the request of Taylor and Rep. Bentley. Here is the arrangement by these groups:

RNC ($2,200)	**Bilal** ($3,000)
Oliver	Shah
McLaughlin	Ashai
Zourdos	Mahmood
Manos	
Barnhill ($850)	**Others** ($500)
Goldsmith	Plank
Burke	
Payne	
Abel	
Barnhill	
Foster	

With the exception of the Plank contribution, the contributions first received by the RNC, Bilal, and Barnhill ("A") were apparently sent to Richard Taylor ("B"), who gave them to Rep. Bentley ("C"). Rep. Bentley than gave them to Sharon Hornberger ("D"), who delivered them to Gary Bauer, the treasurer of the Carroll County Federal Account, who deposited them.

As the following discussion will make evident, the RNC, Taylor, and Rep. Bentley are unable to state with certainty the date they respectively received these contributions or when they

were received by Melvin Bilal or Gregory Barnhill. Taylor states in his response that Rep. Bentley "was personally aware of the date of receipt of some of the checks and was advised by me with respect to the remainder." Taylor, however, was not able to be more specific than "mid to late October" for when he received the checks. Rep. Bentley is able to state that she received the checks "on or about" October 28th. Because the treasurer did not know the date these persons received the contributions and because he was unaware of the requirement to report the date of receipt, he instead reported the date on the checks as the date of the contribution.

Also, information regarding the occupation and employer for those contributors who gave more than $200 was apparently not collected and forwarded with the contributions in all instances. Taylor states that the occupation and employer "was either apparent from the face of the check...or was known by Mrs. Bentley...." Rep. Bentley states with respect to most of the contributions that she did not provide Sharon Hornberger with the information but assumed the treasurer would contact the contributor or her if such information was needed.[12] The documents provided by both Taylor and Rep. Bentley included (1) along with the Daniel Oliver contribution a piece of paper with Oliver's name, address, occupation, and employer and (2) along with the Ann Dore McLaughlin contribution a note from Fred Bush

12. The treasurer, Gary Bauer, instead contacted Rep. Bentley's assistant Sandy Morgan rather than the contributors for this information.

indicating it is a contribution from the Secretary of Labor. The Shah and Mahmood checks both indicate "M.D." on them. Thus, among the contributions in excess of $200 only the Ashai ($1,000) and Plank ($500) contributions were forwarded without any occupation and employer information.

1. Received from the Republican National Committee

There were four contributions that Taylor and Rep. Bentley received from the RNC: Daniel Oliver ($1,000); Ann Dore McLaughlin ($1,000); Peter Zourdos ($100); and Andrew Manos ($100). The Commission posed questions to the RNC, Oliver, and McLaughlin.

(a) Daniel Oliver

In his affidavit, Oliver states that he called the RNC to find out how best to further Bush's election without making a direct contribution. He said he was told the appropriate thing to do would be to make a contribution to Victory '88. Therefore, he wrote a check for $1,000 dated September 23, 1988, and sent it by mail to the RNC. On October 21, 1988, Fred Bush forwarded this contribution to Richard Taylor with a cover note on Victory '88 stationery with the RNC address at the bottom. Taylor said he received the check, along with the others in "mid to late October." He assumed Fred Bush had informed the contributor about where the check would go.[13] He says that he turned it, and

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13. Oliver states that in late October 1988 he called the RNC to inquire about the contribution because the check had not yet cleared his bank account. He said he had to call back and was then told the check had been received and was given a "complex explanation" that he does not now recall. He later received a letter dated October 31, 1988, signed by George Bush, thanking

the others, over to Rep. Helen Delich Bentley "well within the 10-day limit" without specifying the date he sent it to her. Rep. Bentley, however, states she received the check on or about October 28th, which she gave to Sharon Hornberger on November 1st. The check was one of those deposited by Gary Bauer, the treasurer of the Federal Account, on November 2nd. Thus, the facts show that the RNC apparently received this check near the end of September but did not forward it until October 21st, which was well beyond the 10-day period. Furthermore, the check did not reach the treasurer of a federal political committee within 10 days of the RNC's receipt of it.

(b) Ann Dore McLaughlin

Ms. McLaughlin states that she made a personal decision to contribute to Bush's campaign. Because she assumed it was "general common knowledge" that such a contribution should be made to the RNC and Victory '88, she sent a check dated October 17, 1988, to the RNC and made payable to Victory '88. She states that the check was mailed to the attention of Fred Bush at the RNC on or about the date of the check. Fred Bush forwarded this check to Taylor with an undated note on RNC notepaper. As with the Oliver check and other checks, Taylor does not specify when he received this check or turned it over to Rep. Bentley. This check was also among those Rep. Bentley says she received on October 28th and turned over to Hornberger on November 1st, and

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(Footnote 13 continued from previous page)
him for the contribution, on letterhead indicating the letter was paid for by the RNC.

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which was deposited by Bauer on the 2nd. Given the date of the check, up to 15 days could have elapsed between when it was written and its receipt by Bauer. This period would include time for mailing the check from the contributor to the RNC. The evidence, however, does not clearly establish that this contribution was forwarded to Bauer within the 10-day period.

(c) Zourdos and Manos

Peter Zourdos and Andrew Manos both made $100 contributions each to Victory '88 on checks dated October 15, 1988. Zourdos and Manos are reportedly co-owners of an auto dealership. They originally sent their contributions to the RNC. The RNC did not specify when it received these checks, though this office notes that the Manos check appears to have an "Oct. 18, 1988" date stamped on it. Fred Bush sent the checks to Richard Taylor on "George Bush for President" notepaper. Neither the RNC nor Taylor stated when these checks were forwarded. As with the Oliver and McLaughlin checks, Taylor said he received the Zourdos and Manos checks in mid to late October and promptly sent them to Rep. Bentley. Rep. Bentley states that she received them on or about October 28, 1988, and turned them over to Ms. Hornberger on November 1, 1988. These checks were also among those deposited by Gary Bauer on November 2, 1988.

Although there is an Oct. 18th date stamped on a copy of the Manos contribution, it may or may not be the date the RNC received these contributions. Because the RNC did not keep records regarding these contributions, it is not able to establish the actual date it received them. Thus, the evidence

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does not show that they were forwarded within the 10-day period to the treasurer of a federal political committee.

2. Received from Melvin Bilal

Three contributions are attributed to a fundraiser held at the request of Rep. Bentley and Richard Taylor by Melvin Bilal, who is not a respondent, at the home of a physician. The contributors were informed that their contributions would be turned over to Rep. Bentley or Taylor, who would apply them as they saw fit. In a letter to counsel for Rep. Bentley, Bilal states that contributors were requested to make their checks payable to Victory '88. He says that among the checks he received were ones written by Tariq Mahmood, Parvez Shah, and Shaukat Ashai. Rep. Bentley states that she has learned Bilal may have held these checks for approximately one week before turning them over to Taylor, who later sent them to her.

(a). Parvez Shah and Shaukat Ashai

The Commission sent interrogatories to Parvez Shah and Shaukat Ashai, but neither of them responded even after reminder letters were sent and other attempts to reach them were made. Subsequently, counsel for Rep. Bentley informed this Office that he had obtained statements from Shah and Ashai, which he then submitted. Shah and Ashai state that they attended a fundraiser for Victory '88 at the home of a physician where Rep. Bentley spoke. They made their contributions payable to Victory '88 with the understanding the checks would be turned over to Rep. Bentley or Taylor who would use the funds as they saw fit.

Shah's contribution for $1,000 was made payable to Victory

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'88 on a check dated October 12, 1988, with the notation "Maryland." Ashai's contribution for $1,000 was made payable to Victory '88 on a check dated October 11, 1988, with the notation "election contribution Bush." As with the contributions received from the RNC, Taylor does not specify the date he received them or the date he sent them to Rep. Bentley other than to say he received them in mid to late October and promptly sent them to Rep. Bentley. Rep. Bentley states that she received them on or about October 28th and gave them to Ms. Hornberger on November 1st. They were also among the checks deposited by Bauer on November 2nd.

(b). Tariq Mahmood

Rep. Bentley, Taylor, and Bilal all place the Mahmood contribution as among those received as part of the fundraiser Bilal organized at a physician's home. The Commission also sent interrogatories to Mahmood, who responded on October 16th, giving a different version.

In an affidavit, Mahmood states that he was contacted by the office of Alan Keyes, the Republican candidate for the Senate in Maryland in 1988, and invited to a luncheon in Baltimore on October 11, 1988. He was told the luncheon was being held to raise funds for Keyes' Senate bid and that President Reagan would attend. He said he was asked to contribute $1,000. He said that he "went to the lunch, wrote out my check, had my picture taken with the President, and left thereafter." He said he gave the check to a "person whom I took to be a member of the staff" of Keyes. He said he believed he was making a contribution to help

elect Keyes, but he was told to make the check payable to Victory '88, which he did. Mahmood's check was dated October 11, 1988, and made payable to Victory '88.

As noted, Mahmood is not able to identify the person to whom he gave his check. It may or may not have been Bilal. Nevertheless, Mahmood's check somehow found its way into the group associated with the Bilal fundraiser and was among those given to Taylor, who sent them to Rep. Bentley. It was among those Rep. Bentley gave to Ms. Hornberger on November 1st and deposited by Bauer on November 2nd.

3. Received from Gregory Barnhill

Six small contributions were apparently solicited by Gregory Barnhill, apparently at the request of Rep. Bentley. These contributions include: James P. Goldsmith ($150 and dated October 7th); Kenneth Burke ($100 and dated October 6th); Joseph Payne ($200 and dated September 23rd); June Abel ($100 and dated September 24th); Robert B. Barnhill ($100 and dated October 1st); and John J. Foster, Jr. ($200 and dated September 23rd).

Rep. Bentley indicates that Barnhill, who is not a respondent, informed the contributors that the checks would be turned over to her and that she would apply the funds to Victory '88 activities. These checks are dated between September 23rd and October 7th. Thus, they were apparently collected over a period of time and may have been held by Barnhill for an undetermined amount of time. As a group, they total $850. Barnhill sent them to Carol L. Hirschburg, but no one has been able to specify the date he sent them to her. Hirschburg, in

turn, sent them to Virginia Love, again on an unspecified date. Rep. Bentley states that Ms. Love gave them to her on or about October 28th. Rep. Bentley gave them to Ms. Hornberger on November 1st. They were also included in the November 2nd deposit. Richard Taylor, however, has also included these checks within the group of contributions he received and sent to Rep. Bentley. His response also includes copies of this group of checks. Thus, the actual sequence of intermediaries can no longer be determined.

4. Others

The only remaining contribution of the fourteen involved in the forwarding issue is the $500 contribution from Jayne H. Plank. Taylor states that he did not receive and send on this check. Instead, Rep. Bentley states that she personally solicited this contribution from Ms. Plank, a personal friend. She said she received the check directly from Ms. Plank and asked her to make it out to Free State Victory '88. The check itself is dated only as October 1988 and made payable to "FS Victory '88." Rep. Bentley states that she does not recall the exact date she received the check but believes it was on October 28th or a few days before. Rep. Bentley states that although the check was made payable to Free State Victory '88, it was Ms. Plank's intent that Rep. Bentley have discretion to apply the funds as she saw fit. Therefore, Rep. Bentley elected to have the funds deposited into the Carroll County Federal Account. She gave the check to Ms. Hornberger on October 28th. Bauer deposited this check as part of the October 29th deposit. As

noted, the Plank check does not indicate the date it was written. Rep. Bentley's statement that she received it at least within a few days of October 28th and Bauer's evidence that it was deposited on the 29th indicate that it was more than likely forwarded within the 10-day period. It was forwarded to the chairman of the Carroll County Republican Central Committee, who promptly turned it over to the treasurer of the Federal Account for deposit.

5. Altered Payee Lines

In the First General Counsel's Report, this Office also noted that 13 of the above 14 contributions had the notation "CCRCCFA" added to the payee line of the checks, which had otherwise been made payable only to "Victory '88." The "CCRCCFA" notation appeared to be in handwriting other than that of the person who had originally written the check. Although this circumstance appeared troublesome, we made no recommendation at that time because it was not apparent that this alteration of the checks constituted a violation of the Act or regulations or how it may relate to other issues in this matter. The questions to the respondents, however, did seek to identify who or at what point this notation had been added to the checks.

In his response Taylor states that he does not know who added the notation and "was not aware that such a notation had been added to the checks." He refers to a photocopy of the checks he sent to Rep. Bentley as indicating that none of them had such a notation on them at the time he gave them to her. In her response, Rep. Bentley also states that she does not know who

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added the notation to the checks. She also refers to photocopies of the checks provided as part of her response as indicating that the notation did not appear on the checks when they left her possession. She says the photocopies were made by her assistant Sandy Morgan before the checks were given to Sharon Hornberger.[14] Ms. Hornberger's response regarding the notation merely repeats her statement that she has no independent recollection of handling these checks and then reviews her customary practice in handling such checks. Gary Bauer, the Federal Account treasurer, states that the notation was on the checks when he received them, but he does not know who put it on them. The photocopies of the subject checks attached to the responses of Ms. Hornberger and Bauer contain the "CCRCCFA" notation on them.

After further examination and review, this Office concludes that the addition of the "CCRCCFA" notation to the checks, which were already made payable to "Victory '88," does not appear to have violated any provision of the Act or regulations; and, thus, further investigation of this issue is not necessary. First, we note that no provision of the Act addresses the form or execution of contribution checks except for Title 26 candidates. The Act does require a political committee to establish a campaign depository at a recognized institution and to deposit "all receipts" into that depository. The regulations do provide that

14. As previously noted, this point is partially corroborated by Ms. Hornberger's own response where she states that when she first went to pick up checks from Rep. Bentley, a woman who she believes was Sandy Morgan was copying checks, which she indicated were the checks to be given to Ms. Hornberger.

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a contribution made by check is attributed to the last person signing the instrument prior to delivery to the candidate or committee and explain the treatment of contributions from more than one person made by a single instrument. 11 C.F.R. § 104.8(c) and (d). The regulations under Title 2 do not, however, contain any provision that addresses the form or execution of contribution checks regarding the payee line. In the Title 26 context, however, the Commission has promulgated a regulation that requires contributor checks to be made payable to the presidential candidate or his or her authorized committee in order to be matchable. 11 C.F.R. § 9034.2(c). The absence of a similar provision with respect to Title 2 is noteworthy. Thus, nothing in the Act or regulations under Title 2 as presently written appears to present a basis for concluding a violation has occurred in this regard. As noted below, the checks were merely made payable to "Victory '88", which did not identify any particular federal committee or account. All of the checks at issue here were in fact deposited into the Carroll County Republican Central Committee Federal Account, which was used for Victory '88 purposes.

Moreover, based on preliminary research by this Office, the addition of the "CCRCCFA" notation to the checks may not be a violation of the Uniform Commercial Code.[15] For instance, Section 3-115 of the U.C.C. covers the authorized and unauthorized completion of an instrument that is incomplete when signed. An

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15. Construction of the Uniform Commercial Code is outside the Commission's jurisdiction.

authorized completion is basically one that carries out the intent of the parties. An unauthorized completion is governed by Section 3-407 regarding alteration of the document. That section basically provides that an alteration must be material to affect the enforceability of the instrument. A material alteration is one that changes the contract of the parties. Thus, it appears that an unauthorized completion may nevertheless remain nonmaterial if it is not made for a fraudulent purpose and does not change the contract of the parties.

In this situation, the evidence indicates that the contributors intended their contributions to go toward Victory '88 activities on behalf of the Republican ticket. Since the disbursements from the Carroll County Federal Account were made in support of Victory '88 activities or were transferred to other Victory '88 committees, the funds were used as intended by the contributors. Thus, the addition of the "CCRCCFA" notation could be viewed as a nonmaterial alteration, not made for fraudulent purposes, in that it carried out the intended purposes, or contract, of the parties.

Furthermore, all of the contributions were made payable to Victory '88 by the contributor. Victory '88 was the general term used to describe the overall fundraising project as well as a host of other Republican Party activities on behalf of its ticket in 1988. In some cases, committees with the name Victory '88 were used. In other cases, existing committees with different names were used for receipt and disbursement of funds. Thus, the term itself was ambiguous and incomplete and did not clearly

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indicate any specific committee but only a general term for a group of party activities. This Office also notes that the Commission's experience shows that party committees in soliciting funds often ask that checks be made payable to the name of the fundraising program rather than the name on the bank account into which the funds are deposited. The responses from Taylor and Rep. Bentley point out that nearly all of the contributors intended their contributions to be applied on behalf of Victory '88 activities and to be deposited where Taylor and Rep. Bentley saw fit.[16] In this regard, the addition of the "CCRCCFA" notation could be construed as merely completing the otherwise ambiguous term of "Victory '88" to further the intent of the parties.

Therefore, based on the above discussion, this Office makes no recommendation regarding the addition of the "CCRCCFA" notation to the checks in this matter.

6. Conclusion

The facts show that Richard Taylor and Rep. Helen Delich Bentley were the principal persons engaged in raising funds for Victory '88 in Maryland and were the principal persons who were instrumental in raising the funds at issue in this matter. The facts also show, however, that Richard Taylor was not the first person to receive or forward any of the fourteen contributions involved in the forwarding issue. They also show that the only

16. Daniel Oliver did raise questions about the addition of the "CCRCCFA" notation to his check. Nevertheless, the facts show that his contribution was applied as he intended it. Thus, the addition of this notation, although unauthorized, does not appear to constitute a material alteration of the instrument in that it did not change the contract of the parties.

contribution that Rep. Bentley was the first person to receive and forward was the $500 contribution from Jayne Plank, which Rep. Bentley apparently forwarded within 10 days to Sharon Hornberger, the chairman of the Carroll County Republican Central Committee, into whose Federal Account the contribution was promptly deposited. Therefore, we recommend that the Commission take no further action with respect to Richard Taylor and Rep. Helen Delich Bentley and close the file as to these respondents.

The other thirteen contributions were initially received and forwarded by the Republican National Committee, Melvin Bilal, and Gregory Barnhill. As outlined later in this report, this Office recommends entering into preprobable cause conciliation with the Republican National Committee regarding Section 432(b)(2). As previously noted, Bilal and Barnhill are not presently respondents in this matter. In consideration of the relative amounts involved, Bilal's and Barnhill's status as volunteers, and the efficient use of resources, this Office makes no recommendation with regard to them.

F. Reporting and Recordkeeping Issues

The findings made with respect to the Carroll County Federal Account and its former treasurer, Gary Bauer, relate to (1) the alleged failure to keep proper records regarding the date of receipt and, where required, the occupation and employer of 24 specific contributions, (2) the alleged failure to report correctly those of the 24 contributions requiring itemization, (3) the alleged failure to deposit the contributions within 10 days of their receipt by the treasurer, and (4) the treasurer's

alleged failure to file accurate reports. These 24 contributions include the 14 discussed above under the forwarding section as well as these additional 10 contributions:

Name	Check Date	Amount
Ruth Kraus	10-23	$1,000
Henry A. Rosenberg, Jr.	10-24	1,000
Lawrence Rachuba	10-25	1,000
John B. Burcham, Jr.	10-24	1,000
W. Dale Hess	10-26	1,000
Leone W. Hendrox (Tudor Manor Partnership)	11-7	2,000
Jean M. Shannon	10-27	250
Ronald G. Alessi, Sr.	11-7	500
Gordon Smith	10-21	200
William R. Rothe	10-23	200

(1) Timely Deposit

The Smith, Rosenberg, Burcham, Hess, and Rothe contributions were included in the group of checks Rep. Bentley gave to Ms. Hornberger on October 28th and in Bauer's October 29th deposit. This group also included the Plank contribution. The Kraus, Rachuba, and Shannon contributions were included in the group of checks Rep. Bentley gave to Hornberger on November 1st and in Bauer's November 2nd deposit. This group also included the other 13 contributions discussed with respect to the forwarding question. The Tudor Manor (Hendrox) and Alessi contributions were dated November 7th, given by Rep. Bentley to Ms. Hornberger on November 10th, and deposited on November 14th. Thus, the facts as now known demonstrate that the checks were deposited within 10 days of the treasurer's receipt as required by 11 C.F.R. § 103.3(a).

Therefore, based on the above discussion, we recommend that the Commission take no further action against the Federal Account

and Bauer regarding 11 C.F.R. § 103.3(a). With regard to Bauer and the other findings with respect to him, we are recommending that the Commission enter into preprobable cause on conciliation. With regard to the Federal Account and the other findings with respect to it, we are recommending also that the Commission take no further action.

(2) Reported Date

Fourteen of the 24 contributions required itemization.[17] The treasurer reported the "date" on Schedule A as the date on the check. Commission regulations specify that contributions are itemized to include the "date of receipt." 11 C.F.R. § 104.3(a)(4)(i) and 2 U.S.C. § 434(b)(3)(A).

Bauer states in his response that he was unaware of the requirement regarding the date line. He further states that "[a]s the dates on the first report were not questioned, I continued to use the dates of the checks on all FEC forms." He states that if "this matter had been brought to my attention, I would have used the appropriate date." We note that the regulations do not define the "date of receipt," especially with regard to whether it is the date the treasurer received the contribution or, in the case where a contribution is forwarded, the date the person forwarding the contribution received it. Because Section 432(b)(2) requires the person forwarding a contribution to include the date of receipt, it appears that this

17. These fourteen are the Oliver, McLaughlin, Shah, Ashai, Mahmood, Plank, Kraus, Rosenberg, Rachuba, Burcham, Hess, Tudor Manor, Shannon, and Alessi contributions.

requirement exists so that the treasurer can report these contributions with the earlier date.

In this particular case, as pointed out in the previous section, the date of receipt was not provided by the forwarding persons. Thus, Bauer was not in a position as treasurer to be able to report the earlier date of receipt. The persons who forwarded these contributions are not now able to identify the date they received and forwarded them. Nevertheless, Bauer's use of the date on the check was clearly incorrect. It also resulted in his reporting contributions in the Post General Election Report with dates falling within an earlier reporting period. After inquiries from the Reports Analysis Division ("RAD"), Bauer amended the earlier reports to include some of these contributions, but he was still using the date on the check, not the date of receipt. The letters from RAD only pointed out that the report included financial activity falling within another reporting period. It did not provide any guidance on the "date" of a contribution or "date of receipt."

(3) Occupation and Employer

The Act also requires that where contributions from a single contributor aggregate more than $200 in a calendar year, the itemization of such contributions shall provide the identification of the contributor, which shall include the occupation and employer of the contributor. 2 U.S.C. §§ 434(b)(3)(A) and 431(13)(A). The Act provides that where a treasurer uses "best efforts" to obtain necessary information, the reports filed shall be deemed to be in compliance with the

Act. 2 U.S.C. § 432(i). Commission regulations explain that with respect to the identification of contributors, the treasurer shall not be deemed to have undertaken "best efforts" unless the treasurer "has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain such information from the contributor," including a clear request for the information that informs the contributor the information is required by law. 11 C.F.R. § 104.7(b).

As noted, 14 of the 24 contributions required itemization. Of these, only the Mahmood, Shah, Rosenberg, and Rachuba contributions included full occupation and employer information. The Hess contribution included occupation information, but not employer information. Kraus was identified as a housewife. The remaining eight itemized contributions had "Information Requested" entered in the employer and occupation block of Schedule A.

As previously noted, Richard Taylor said the occupation or employer of the contributor was either apparent from the face of the check or was known to Rep. Bentley. In turn, Rep. Bentley states that she did not provide any occupation or employer information to Ms. Hornberger, but assumed the treasurer would contact the contributor for such information. We note, however, that documents that apparently accompanied the Oliver and McLaughlin contributions when they were delivered to Ms. Hornberger indicated that Oliver was chairman of the Federal Trade Commission and McLaughlin was Secretary of Labor. The photocopy of the sheet provided by Rep. Bentley for the Burcham

contribution also identified his employer.

Bauer states in his response that he "was not provided with the occupation nor the employer of the contributors when I received them." He further states:

> I informed Mrs. Hornberger of this matter because of the requirement in filing the FEC reports. She informed me to contact Sandy Morgan (301-561-1777), Mrs. Bentley's secretary, who would provide the additional information. I contacted Ms. Morgan and she was able to provide information on some of the contributors but not all.
>
> Ms. Morgan told me to place "information requested" on the FEC report and she would obtain the necessary information and forward it to me. As of my termination as treasurer on April 18, 1989, I had not received the information in question.

Bauer has not made any statement or produced any evidence that he sought this information from the contributor as required by the regulation.

On September 18, 1989, in response to the Commission's finding, Louis E. Wiser, Jr., the new treasurer of the Federal Account, filed an amendment to the committee's reports that provided the occupation and employer information for Oliver, Ashai, McLaughlin, Burcham, Hess, Shannon, Plank, and Alessi contributions. This amendment also clarified the $2,000 Tudor Manor Partnership contribution as attributed $1,000 each to Ron Burkhead and Clyde Hendricks and provided their occupation and employer.

Thus, the Federal Account and its new treasurer have undertaken to obtain and provide the Commission with the information regarding the identification of the itemized contributions that Bauer had not sought or provided.

(4) Recordkeeping

The Act also provides that the treasurer of a political committee shall keep an account of the identification of any person who makes a contribution(s) aggregating more than $200 during a calendar year together with the date and amount of any such contribution. 2 U.S.C. § 432(c)(3). As the preceding discussion makes clear, Bauer did not keep an account of the date of receipt of the contributions in question and did not keep an account of the identification of those contributors whose contribution aggregated more than $200 in 1988.

(5) Accuracy of Reports

Commission regulations provide that a treasurer of a political committee shall be personally responsible for the timely and complete filing of reports and the accuracy of any information contained in them. 11 C.F.R. § 104.14(d). As the above discussion illustrates, Bauer failed to properly discharge this responsibility. The evidence also does not show that Bauer used best efforts. For instance, he made an inquiry for the missing occupation and employer information to an aide to Rep. Bentley rather than to the contributor as required by the regulation.

(6) Conclusion

As this discussion points out, the contributions were deposited within 10 days of the treasurer's receipt. With regard to the recordkeeping and reporting issues, we note that the errors and oversights were those of Bauer, the former treasurer. The Commission made separate findings with respect to the Federal

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Account and its former treasurer, Gary Bauer. The findings against Bauer were made with respect to him personally, not "as treasurer." Therefore, we are recommending that the Commission enter into preprobable cause conciliation with Bauer on these recordkeeping and reporting violations. No finding was made with respect to the current treasurer, Louis Wiser, who had not been involved in any of the subject transactions and who had submitted this matter, sua sponte, to the Commission for its review of potential violations of the Act. The Federal Account's new treasurer (Wiser) has undertaken to rectify the reporting and recordkeeping errors committed by its former treasurer. Therefore, for these reasons, we recommend taking no further action against the Federal Account with respect to the 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A).

G. Northwest National Bank PAC Contribution

As noted in the General Counsel's Report dated October 5, 1989, Baltimore County Victory '88 reported a $5,000 contribution from the Northwest National Bank Political Action Committee ("Northwest National Bank PAC") with a date of January 5, 1989. Northwest National Bank PAC reported this contribution as made on October 28, 1988, to "Victory '88 c/o Mr. James F. Keenan, Pace Industries, Inc., 217 Easy Street, Aiken, SC 29801." Thus, based on these facts, the Commission found reason to believe James F. Keenan violated 2 U.S.C. § 432(b)(2) and sent questions to him, Northwest National Bank PAC, and Baltimore County Victory '88.

James Keenan states in his affidavit that he was a member of

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Team 100 and a supporter of George Bush in the 1988 campaign and that he made requests to family members and close associates to assist the Bush campaign. In that regard, he states that he had a conversation with Virginia Morris, president of the Northwest National Bank PAC in Fayetteville, Arkansas,[18] and requested that she join Team 100 to show her support for Bush. He states that she declined but instead forwarded to him the $5,000 contribution from the PAC made payable to Victory '88. He adds that he was not asked by anyone to contact Mrs. Morris, but he apparently did so on behalf of Team 100.

Mrs. Morris states in her affidavit that she was contacted as an individual by Keenan about whether she would be interested in becoming a member of the "Committee for 100." She adds that she declined but advised Keenan that the PAC would make a "general contribution" to Victory '88. Accordingly, she states that the PAC issued a check for $5,000 dated October 28, 1988. She states that this check was mailed to Keenan on October 28 with a cover letter. In that letter Mrs. Morris notes the enclosed contribution "made payable to Victory '88 for you to place where needed and legally eligible." She further states:

> ...It was our understanding the contribution would be used as the Victory '88 committee deemed necessary to support Republican candidates. There were no specific instructions and/or discussions concerning where the funds would be placed.

Keenan states that he received this contribution from Mrs.

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18. Although Keenan is located in Aiken, South Carolina, Pace Industries is headquartered in Harrison, Arkansas, which is 50 miles northeast of Fayetteville.

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Morris and on the "same or next day" forwarded it to the Republican National Committee ("RNC") in care of the Team 100 coordinator. He adds that after forwarding the check to the Team 100 headquarters "in early November," he had no further information concerning its ultimate use. He further states that no third party requested or directed that he forward this contribution to Team 100 but that "[i]t seemed the logical thing to do as I was a member of this group, and the check was a result of my request that Virginia Morris join it."

The RNC states that it conducted a review of its files and interviews of current and former employees but could not yield any records or independent recollection regarding this check and its forwarding to the Baltimore County Victory '88. It appended affidavits from Frederick M. Bush, formerly a consultant to the RNC, and Michael Hess, deputy chief counsel to the RNC. The RNC further states that it "appears that this failure [to forward the check] was inadvertent, and since the RNC cannot prove or disprove the Commission's Analysis, the RNC believes that pre-probable cause conciliation under 11 C.F.R. § 111.18(d) would be appropriate."

Rep. Helen Delich Bentley states in her sworn response that she "has no independent recollection or written record of receiving the check in question." She adds:

> She believes that it was hand-delivered to her at a social gathering in Washington, D.C. on or about December 13, 1988. The check would have been delivered to her by someone affiliated with the Republican National Committee ("RNC"), but beyond an impression that the person was Frederick Bush, she cannot recall whom.

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Rep. Bentley adds that after receipt of the check, she offered it to the Carroll County and Baltimore City parties. When they had no need for the funds, she directed the check to the Baltimore County Victory '88 committee and on or about January 3, 1989, delivered the check to Marjorie Neuman, treasurer of the committee.

Marjorie Neuman, treasurer of Baltimore County Victory '88, states in her affidavit that she received this contribution "on or about January 5, 1989," when it "was handed to me by Congresswoman Helen Delich Bentley...in her Towson District Office...." She included a copy of a letter that accompanied the check. This letter was from Susan Henderson, secretary to James Keenan, addressed to Betsy Tyson at the RNC, and dated November 10, 1988. It states: "[p]er our telephone conversation this morning, I am enclosing the check I mentioned." Mrs. Neuman adds that to her knowledge "Baltimore County Victory '88 did not request or solicit this contribution."

The investigation has thus established that James F. Keenan received the check in early November 1988 and promptly sent it to the RNC. Rep. Bentley recalls having received it on or about December 13, 1988.[19] Thus, at that point, the RNC had had possession of the check for approximately one month without forwarding it to any Victory '88 committee. Thus, the information supports the reason to believe findings with respect

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19. Rep. Bentley appears to have held the check for approximately three weeks prior to delivering it to Ms. Neuman. Nevertheless, by the time Rep. Bentley received the check, the RNC has already held up its forwarding beyond the required period.

to the RNC and 2 U.S.C. § 432(b)(2).[20] Therefore, this Office recommends that the Commission enter into preprobable cause conciliation with the RNC with respect to the failure to forward the $5,000 check from Northwest National Bank PAC as well as the $2,200 in checks deposited in Carroll County.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

a. Gary Bauer

This Office proposes that the Commission enter into preprobable cause conciliation with Gary Bauer, the former treasurer of the Federal Account.

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20. Although the RNC was in this instance not the first person to receive and forward the check, it is appropriate to hold it responsible for the forwarding delay because of the length of time it held the check and because Keenan solicited and received the check as part of his activities on behalf of the RNC as a member of its Team 100 project.

b. RNC

This Office also proposes that the Commission enter into preprobable cause conciliation with the Republican National Committee.

IV. RECOMMENDATIONS

1. Take no further action against the Carroll County Republican Central Committee Federal Account with respect to 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a) and close the file as it pertains to this respondent.

2. Take no further action against Richard P. Taylor and Helen Delich Bentley with respect to 2 U.S.C. § 432(b)(2) and close the file as it pertains to these respondents.

3. Take no further action against Gary W. Bauer with respect to 11 C.F.R. § 103.3(a).

4. Enter into conciliation with Gary W. Bauer prior to a finding of probable cause to believe.

5. Enter into conciliation with the Republican National Committee prior to a finding of probable cause to believe.

6. Approve the attached proposed conciliation agreements and appropriate letters.

Date 8/1/90

Lawrence M. Noble
General Counsel

Attachments

1. Bauer Response
2. Bentley Response
3. RNC Response
4. Hornberger Response
5. Taylor Response
6. Oliver Response
7. McLaughlin Response
8. Mahmood Response
9. Plank Response
10. Ashai and Shah Responses
11. Second Response from Bentley
12. Second Response from RNC
13. James Keenan Response
14. Northwest National Bank PAC Response
15. Neuman Response
16. Proposed Conciliation Agreement, Bauer
17. Proposed Conciliation Agreement, RNC

Staff Assigned: George Rishel
Jeffrey D. Long

2004031032

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carroll County Republican Central Committee Federal Account;	)	MUR 2936
Rep. Helen Delich Bentley;	)	
Richard P. Taylor;	)	
Republican National Committee;	)	
Gary W. Bauer.	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 21, 1990, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2936:

1. Take no further action against the Carroll County Republican Central Committee Federal Account with respect to 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a) and close the file as it pertains to this respondent.

2. Take no further action against Richard P. Taylor and Helen Delich Bentley with respect to 2 U.S.C. § 432(b)(2) and close the file as it pertains to these respondents.

3. Take no further action against Gary W. Bauer with respect to 11 C.F.R. § 103.3(a).

4. Enter into conciliation with Gary W. Bauer prior to a finding of probable cause to believe.

(continued)

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5. Enter into conciliation with the Republican National Committee prior to a finding of probable cause to believe.

6. Approve the proposed conciliation agreements and appropriate letters as recommended in the General Counsel's report dated August 1, 1990.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens was not present.

Attest:

8-24-90
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 5, 1990

Benjamin L. Ginsberg, Esquire
Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

2 0 1 3 5

Dear Mr. Ginsberg:

On August 14, 1989, and on February 12, 1990, the Federal Election Commission found reason to believe that the Republican National Committee violated 2 U.S.C. § 432(b)(2). At your request, on August 21, 1990, 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 your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with

a mutually satisfactory conciliation agreement, please contact George F. Rishel or Jeffrey D. Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

9004081220336

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 5, 1990

Benson Everett Legg, Esquire
Venable, Baetjer & Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, MD 21201

RE: MUR 2936
Helen Delich Bentley

Dear Mr. Legg:

On August 22, 1989, your client was notified that the Federal Election Commission found reason to believe that she violated 2 U.S.C. § 432(b)(2). On October 5, 1989, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on August 21, 1990, to take no further action against Helen Delich Bentley, and closed the file as it pertains to her. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that a person's failure to forward contributions of $50 or greater to the treasurer of the political committee to which the contributions are made payable within 10 days of a person's receipt of such contributions appears to be a violation of 2 U.S.C. § 432(b)(2). Your client should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact George F. Rishel or Jeffrey D. Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

20040312038

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 1990

Richard P. Taylor, Esquire
Steptoe & Johnson
1330 Connecticut Avenue
Washington, D.C. 20036

RE: MUR 2936
Richard P. Taylor

Dear Mr. Taylor:

On August 22, 1989, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 432(b)(2). On September 13, 1989, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on August 21, 1990, to take no further action against Richard P. Taylor, and closed the file as it pertains to you. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that a person's failure to forward contributions of $50 or greater to the treasurer of the political committee to which the contributions are made payable within 10 days of a person's receipt of such contributions appears to be a violation of 2 U.S.C. § 432(b)(2). You should take immediate steps to insure that this activity does not occur in the future.

2004081039

If you have any questions, please contact George F. Rishel or Jeffrey D. Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2004031200440

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 5, 1990

Louis E. Wiser, Jr., Treasurer
Carroll County Republican Central
Committee Federal Account
2810 Gillis Street
Mt. Airy, MD 21771

RE: MUR 2936
Carroll County Republican
Central Committee Federal
Account

Dear Mr. Wiser:

On August 22, 1989, you were notified that the Federal Election Commission found reason to believe that the Carroll County Republican Central Committee Federal Account violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 103.3(a).

After considering the circumstances of the matter, the Commission determined on August 21, 1990, to take no further action against the Carroll County Republican Central Committee Federal Account, and closed the file as it pertains to it. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that the failure to keep a record of the indentification of contributions aggregating in excess of $200 from the same contributor and to itemize such contributions, including the occupation and employer of the contributor, on reports filed with the Commission appear to be violations of 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A). You should take immediate steps to insure that this activity does not occur in

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the future.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

20040112042

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 5, 1990

Richard V. Boswell, Esquire
Stoner, Preston & Boswell, Chartered
P.O. Box 389
Westminster, MD 21157-0389

RE: MUR 2936
Gary Warren Bauer

Dear Mr. Boswell:

On August 14, 1989, the Federal Election Commission found reason to believe that Gary Warren Bauer violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. §§ 103.3(a) and 104.14(d). On September 28, 1989, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of the matter, the Commission determined on August 21, 1990, to take no further action against Gary Warren Bauer with respect to 11 C.F.R. § 103.3(a). At your request, on August 21, 1990, the Commission also 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 with respect to the other findings.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agrees 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

2040812043

a mutually satisfactory conciliation agreement, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

20040310044

OGC7910

P.O. Box 398
Manchester, Maryland 21102
September 12, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 SEP 18 PM 3:09

Ms. Lee Ann Elliott, Chairwoman
Federal Elections Commission
999 E Street NW
Washington, DC 20463

RE: MUR 2936
Carroll County Republican Central Committee

Dear Chairwoman Elliott:

I would like to request some information in clarification of MUR 2936 with regard to the changing membership of our committee. As a result of the Maryland primary election yesterday, I was the only one of the seven current members of the committee re-elected to serve on the new committee that takes office after the general election in November.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 18 PM 4:27

My major concern is about the potential liability of the new committee for fines or refunds of contributors' funds that may result from the secret actions of only two members of the current committee.

This is probably an unusual MUR that began when we requested a review of our own activities in a letter sent to the FEC dated May 25, 1989. Our concerns focused on irregularities in the diversion of campaign funds from the national and state parties into our account. In addition, this activity was concealed from five of the seven members of our committee in apparent violation of the committee's own bylaws.

It was the intent of our committee, acting as a whole body, to rectify any outstanding problems with the administration of our account. To this end, we requested pre-probable cause conciliation and waiver of confidentiality. On August 14, 1989, the FEC found that there is reason to believe that our committee violated 2 U.S.C. S 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. S 103.3(a).

My primary question is how does the MUR apply once the membership of the Carroll County Republican Central Committee changes? Does it apply to the former members of the committee? Or does it carry over as unfinished business to the new committee? If it carries over to the new committee, is there a way in which the party that undertook the secret actions can be held responsibile for fines and/or return of contributors' funds as part of a conciliation agreement?

Your answers would help resolve some lingering questions for both the current and the newly-elected members of the committee. Thank you for your consideration.

Sincerely,

Joseph M. Getty

OGC 7444

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
FAX (301) 244-7742
TELEX 898032

WASHINGTON, D. C.
McLEAN, VA
ROCKVILLE, MD
TOWSON, MD
BEL AIR, MD

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

WRITER'S DIRECT NUMBER IS

244-7404

90 AUG 15 AM 10:49

August 14, 1990

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

90 AUG 15 PM 12:04
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

Congresswoman Bentley has been contacted by Stephen Montanarelli, the Maryland State Prosecutor. Stemming from complaints made by two members of the Carroll County Republican Central Committee, Mr. Montanarelli has been asked to investigate the Carroll County Federal Account to determine whether there were any violations of state law in connection with the checks that were deposited into the account. Congresswoman Bentley is willing to cooperate with Mr. Montanarelli by supplying information to him.

I am, however, concerned that by doing so she may violate the requirement of confidentiality imposed by 2 U.S.C. §437g(a)(4)(B) and 437g(a)(12)(A). I am particularly concerned about supplying information about other individuals who are involved in your investigation and who have a right of confidentiality. Mr. Montanarelli has informed me that it is his practice to write a brief report following any investigation and that the report, by virtue of its being made available to the individuals whose complaints initiated the investigation, is a matter of public record. I am, therefore, writing to obtain your guidance in this matter. Please inform me whether or not it is permissible under the confidentiality guidelines for Congresswoman Bentley to furnish information to Mr. Montanarelli. Please call me if you have any questions.

Very truly yours,

Benson Everett Legg

BEL:mtm
1053/24-25/REDLIT

cc: The Honorable Helen Delich Bentley
The Honorable Stephen Montanarelli

0004081230347

OGC7907

VENABLE, BAETJER AND HOWARD

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201-2978
(301) 244-7400
FAX (301) 244-7742
TELEX 898032

WASHINGTON, D. C.
McLEAN, VA
ROCKVILLE, MD
TOWSON, MD
BEL AIR, MD

RICHARD M. VENABLE (1839-1910)
EDWIN G. BAETJER (1868-1945)
CHARLES McH. HOWARD (1870-1942)

BENSON EVERETT LEGG

WRITER'S DIRECT NUMBER IS

244-7404

90 SEP 18 PM12:32

September 14, 1990

90 SEP 18 PM12:35

RECEIVED
FEDERAL ELECTION COMMISSION

George F. Rishel, Esquire
Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR2936 - The Honorable Helen Delich Bentley

Dear Mr. Rishel:

I recently received Lois G. Lerner's letter advising me that the file as it pertains to Congresswoman Bentley will be closed. On behalf of Congresswoman Bentley, I wish to thank you for the professional and courteous manner in which you and your staff conducted the investigation. Please do not hesitate to contact me if you need any further information.

Very truly yours,

Benson Everett Legg

BEL:mtm
1053/63/REDLIT

cc: The Honorable Helen Delich Bentley

7963

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 21 AM 11:22

LAW OFFICES
STONER, PRESTON & BOSWELL, CHARTERED
188 EAST MAIN STREET
POST OFFICE BOX 389
WESTMINSTER, MARYLAND 21157-0389

CHARLES E. STONER
CHARLES M. PRESTON
RICHARD V. BOSWELL
DAVID H. PRATT
LORI JOY EISNER

TELEPHONE 301
WESTMINSTER 848-7777
BALTIMORE 876-7371
FAX 876-0769

September 19, 1990

Office of General Counsel
Federal Election Commission
Room 659
999 E. Street, N.W.
Washington, D.C. 20463

Attn: Lois G. Lerner
Associate General Counsel

Re: MUR 2936
Gary Warren Bauer

90 SEP 24 PM 2:55

Dear Ms. Lerner:

Enclosed herewith please find a Conciliation Agreement filed by me on behalf of my client, Gary Warren Bauer, in response to your letter of September 5, 1990.

I also enclose herewith the sum of $1,000 by check made payable to the Federal Election Committee as the civil penalty assessed in this matter.

I trust that this will finalize this case, but if you should have any questions, feel free to contact me.

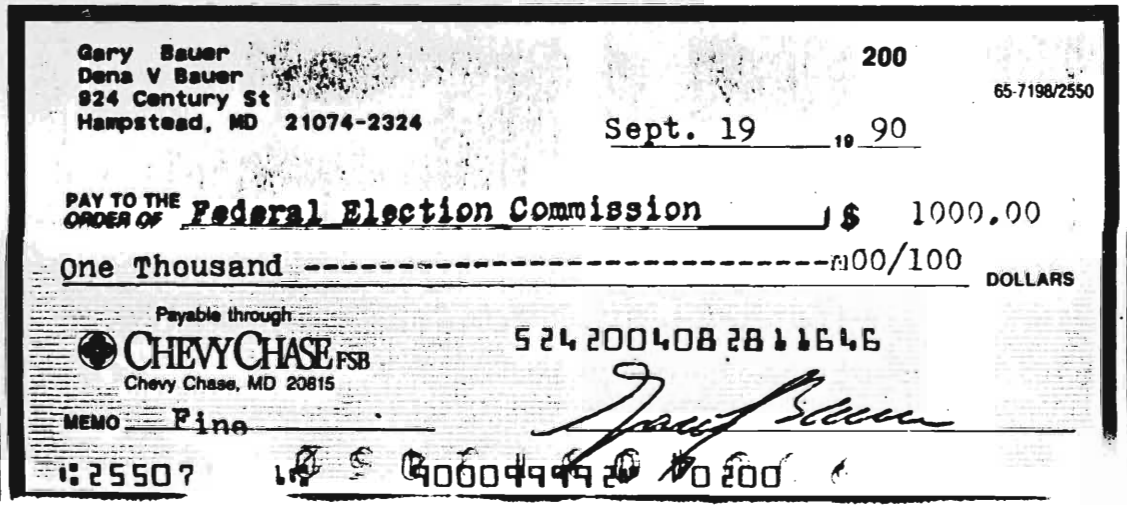
Very truly yours,

STONER, PRESTON & BOSWELL, CHARTERED

Richard V. Boswell

RVB/ced
Enclosure - Check
cc: Mr. Gary Warren Bauer

OGC 7962



Gary Bauer
Dena V Bauer
924 Century St
Hampstead, MD 21074-2324

200

65-7198/2550

Sept. 19 19 90

PAY TO THE ORDER OF Federal Election Commission $ 1000.00

One Thousand ----------00/100 DOLLARS

Payable through
CHEVY CHASE FSB
Chevy Chase, MD 20815

MEMO Fine

524200408 2811646

Gary Bauer

:255071 [illegible] 4000499 [illegible] 0200

FEDERAL ELECTION COMMISSION
SECRETARIAT
90 SEP 27 PM 4:01

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Gary W. Bauer) MUR 2936

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by Richard V. Boswell, counsel for Gary W. Bauer. The attached agreement contains no changes from the agreement approved by the Commission on August 21, 1990. A check for the civil penalty has been received.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Gary W. Bauer.
2. Close the file as to this respondent.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

September 27, 1990
Date

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

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jeffrey Long

0040612051

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2936
Gary W. Bauer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 2, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2936:

1. Accept the conciliation agreement with Gary W. Bauer, as recommended in the General Counsel's Report dated September 27, 1990.

2. Close the file as to this respondent.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 27, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for the decision; Commissioner McGarry did not cast a vote.

Attest:

10-3-90
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thursday, Sept. 27, 1990 4:01 p.m.
Circulated to the Commission: Friday, Sept. 28, 1990 12:00 p.m.
Deadline for vote: Tuesday, Oct. 2, 1990 4:00 p.m.

dh

2 4 0 3 1 3 0 5 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 11, 1990

Richard V. Boswell, Esquire
Stoner, Preston & Boswell, Chartered
188 East Main Street
P.O. Box 389
Westminster, Maryland 21157-0389

RE: MUR 2936
Gary W. Bauer

Dear Boswell:

On October 2, 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. §§ 432(c)(3), 434(b)(3)(A) and 11 C.F.R. § 104.14(d). Accordingly, the file has been closed in this matter as it pertains to your client, Gary Warren Bauer.

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. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

900403 1953

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

4054

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2936
Gary W. Bauer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Gary W. Bauer ("Respondent") violated 2 U.S.C. §§ 432(c)(3) and 434(b)(3)(A) and 11 C.F.R. § 104.14(d).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Carroll County Republican Central Committee Federal Account is a political committee within the meaning of 2 U.S.C. § 431(4)(A) and the local committee of a political party within the meaning of 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(e)(4).

2. Gary W. Bauer was the treasurer of the Carroll County Republican Central Committee Federal Account ("Federal Account") during 1988.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that the treasurer of a political committee shall keep an account of the identification of any person who makes a contribution or contributions aggregating more than $200 during a calendar year, together with the date and amount of any such contribution. 2 U.S.C. § 432(c)(3). The Act defines identification to include in the case of any individual, the name, the mailing address, and the occupation of such individual, as well as the name of his or her employer. 2 U.S.C. § 431(13)(A).

4. The Act provides that every person who receives a contribution for a political committee which is not an authorized committee shall, if the amount of the contribution is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(2). Commission regulations further explain that if the contribution is in excess of $200, such person shall also provide the identification (as defined by 11 C.F.R. § 100.12) of the contributor. The regulations further explain that the date of receipt is the date such person obtains possession of the contribution. 11 C.F.R. § 102.8(b)(2).

5. The Act provides that the treasurer of a political

committee shall be responsible for filing reports of receipts and disbursements in accordance with the Act and shall sign each such report. 2 U.S.C. § 434(a). Each report shall disclose the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of $200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution. 2 U.S.C. § 434(b)(3)(A). Commission regulations explain that the date of the contribution is the date of receipt. 11 C.F.R. § 104.3(a)(4)(i).

6. Commission regulations provide that each treasurer of a political committee shall be personally responsible for the timely and complete filing of reports and for the accuracy of any information contained in the reports. 11 C.F.R. § 104.14(d). The Act provides that when the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by the Act, any report or any records of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(i). Commission regulations explain that with regard to the identification of contributors, the treasurer will not be deemed to have exercised best efforts to obtain the information unless he or she has made at least one effort per solicitation either by written request or by an oral request documented in writing to obtain such information from the contributor. 11 C.F.R. § 104.7(b).

3401057

7. Respondent did not keep a record of the date of receipt, as defined by 11 C.F.R. §§ 102.8(b)(2) and 104.3(a)(4)(i), for contributions totaling $13,250 from these contributors: Daniel Oliver, Ann Dore McLaughlin, Parvez Shah, Shaukat A. Ashai, Tariq Mahmood, Jayne H. Plank, Ruth Kraus, Henry A. Rosenberg, Jr., Lawrence Rachuba, John B. Burcham, Jr., W. Dale Hess, Jean M. Shannon, Ronald G. Alessi, Sr., and the Tudor Manor partnership. Respondent reported these contributors with the date of the check rather than the date of receipt.

8. Respondent did not keep a record of the occupation or employer for contributions totaling $6,250 from these contributors: Daniel Oliver, Ann Dore McLaughlin, Shaukat A. Ashai, Jayne H. Plank, John B. Burcham, Jr., the partners of the Tudor Manor partnership, Jean M. Shannon, and Ronald G. Alessi, Sr. Respondent did not make one written or oral request to these contributors for this information. Instead, Respondent requested such information from an aide to Representative Helen Delich Bentley. Respondent contends that the aide advised him to place "Information Requested" on the reports filed with the Commission for the contributors identified in this subsection. Respondent did not report the occupation or employer for these contributors but put "Information Requested" on the reports in place of this information. At the time the reports were filed, Daniel Oliver was chairman of the Federal Trade Commission, Ann Dore McLaughlin was Secretary of Labor, and John B. Burcham, Jr. was executive director of the National Liquor Stores Association.

9. Respondent filed reports with the Commission that

were incomplete in that they did not have the occupation and employer information for certain itemized contributions and that were inaccurate in that they reported certain contributions by the date of the check rather than the date of receipt. Respondent has not demonstrated that he used best efforts, as defined by 2 U.S.C. § 432(i) and 11 C.F.R. § 104.7(b), to obtain the necessary information.

V. 1. Respondent failed to maintain a record of the identification of all contributors whose contributions aggregated in excess of $200 together with the date of receipt for such contributions in violation of 2 U.S.C. § 432(c)(3).

2. Respondent did not report the identification of all contributors whose contributions aggregated in excess of $200 together with the date of receipt for such contributions in violation of 2 U.S.C. § 434(b)(3)(A).

3. Respondent signed and filed reports with the Commission that were incomplete and contained inaccurate information in violation of 11 C.F.R. § 104.14(d).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of one thousand dollars ($1,000.00), 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.

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

BY: _____ 10/10/90
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENT:

_____ September 19, 1990
(Name) Richard V. Boswell Date
(Position) Counsel for Respondent

RECEIVED

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican National Committee) MUR 2936

GENERAL COUNSEL'S REPORT

SENSITIVE

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by Michael A. Hess, the Deputy Chief Counsel of the Republican National Committee.

The Office of the General Counsel recommends acceptance of the attached agreement.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with the Republican National Committee.

2. Close the file.

3. Approve the appropriate letters (6).

10/19/90
Date

Lawrence M. Noble
General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jeffrey D. Long

2004031-2061

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2936
Republican National Committee.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 24, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2936:

1. Accept the conciliation agreement with the Republican National Committee, as recommended in the General Counsel's Report dated October 19, 1990.

2. Close the file.

3. Approve the appropriate letters (6), as recommended in the General Counsel's Report dated October 19, 1990.

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

Attest:

10-25-90
Date

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

Received in the Secretariat: Monday, Oct. 22, 1990 12:40 p.m.
Circulated to the Commission: Monday, Oct. 22, 1990 4:00 p.m.
Deadline for vote: Wednesday, Oct. 24, 1990 4:00 p.m.

dh

2040812352

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Benjamin L. Ginsberg, Esquire
Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 2936
Republican National Committee

Dear Mr. Ginsberg:

On October 24, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Republican National Committee in settlement of a violation of 2 U.S.C. § 432(b)(2), a provision of the Federal Election Campaign Act of 1971, as amended. 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, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2040312063

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2936
Republican National Committee	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Republican National Committee ("Respondent") violated 2 U.S.C. § 432(b)(2).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Republican National Committee is a political committee within the meaning of 2 U.S.C. § 431(4), the national committee of the Republican Party within the meaning of 2 U.S.C. § 431(14), and a person within the meaning of 2 U.S.C. § 431(11).

2. Victory '88 was a nationwide program of the Republican National Committee to assist state and local party

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organizations with their efforts to provide volunteer support on behalf of the entire Republican ticket in the 1988 November general election.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that every person who receives a contribution for a political committee which is not an authorized committee shall, if the amount of the contribution is in excess of $50, forward to the treasurer such contribution, the name and address of the person making the contribution, and the date of receipt of the contribution, no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(2). Commission regulations further explain that if the contribution is in excess of $200, such person shall also provide the identification (as defined by 11 C.F.R. § 100.12) of the contributor. The regulations further explain that the date of receipt is the date such person obtains possession of the contribution. 11 C.F.R. § 102.8(b)(2). By their terms, these provisions of the Act and regulations contemplate that the first person who receives a contribution for a federal political committee will forward the check directly to the treasurer of the political committee together with the required information within 10 days.

4. On September 23, 1988, Daniel Oliver, then chairman of the Federal Trade Commission, sent a $1,000 check made payable to Victory '88 to the Republican National Committee. On October 21, 1988, Frederick M. Bush, a consultant to the Republican National Committee, sent this check to Richard Taylor, Republican National Committeeman for Maryland and finance chairman of

3405

Maryland Victory '88. Mr. Taylor was not the treasurer of record of any federal political committee at that time. A note on Victory '88 stationery with the Republican National Committee address accompanied this check. Daniel Oliver later received a letter dated October 31, 1988, signed by George Bush, on letterhead with a statement it was paid for by the Republican National Committee, thanking him for the contribution. The check was eventually deposited into the Carroll County Republican Central Committee Federal Account ("Federal Account") on November 2, 1988.

5. On October 17,1988, Ann Dore McLaughlin sent a $1,000 check made payable to Victory '88 to the Republican National Committee to the attention of Frederick M. Bush. This check was subsequently sent to Richard Taylor and eventually deposited into the Federal Account on November 2, 1988.

6. On October 15, 1988, Peter Zourdos and Andrew Manos each made $100 checks payable to Victory '88, which they sent to the Republican National Committee. Frederick M. Bush subsequently sent these checks to Richard Taylor. They were eventually deposited into the Federal Account on November 2, 1988.

7. On October 28, 1988, the Northwest National Bank Political Action Committee of Fayetteville, Arkansas, sent a $5,000 check made payable to Victory '88 to James F. Keenan in Aiken, South Carolina, and reported the making of this contribution in its 1988 Post General Election Report. James F. Keenan forwarded this check to the Republican National Committee

with an accompanying note addressed to Betsy Tyson and dated November 10, 1988. This check was later delivered to Representative Helen Delich Bentley on or about December 13, 1988. Representative Bentley delivered it to Marjorie Neuman, treasurer of the Baltimore County Victory '88 committee, on January 3, 1989. Ms. Neuman deposited the check in the committee's account and reported its receipt on the next report filed with the Commission.

V. Respondent failed to forward the $2,200 in checks from Daniel Oliver, Ann Dore McLaughlin, Peter Zourdos, and Andrew Manos and the $5,000 check from Northwest National Bank Political Action Committee directly to the treasurer of a federal political committee within 10 days of Respondent's receipt of these checks in violation of 2 U.S.C. § 432(b)(2).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of one thousand four hundred twenty-seven dollars ($1,427), 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. Respondent 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.

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

BY: _____ October 30, 1990
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENT:

_____ October 11, 1990
(Name)
(Position)
As Treasurer
Date

2 3 0 4 0 3 1 2 0 5 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Richard V. Boswell, Esquire
Stoner, Preston & Boswell, Chartered
188 East Main Street
P.O. Box 389
Westminster, Maryland 21157-0389

RE: MUR 2936
Gary W. Bauer

Dear Boswell:

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 Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2104081206 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Charles B. Thomas, Esquire
Thomas, Hirsch & Albert, P.C.
1828 L Street, N.W., Suite 720
Washington, D.C. 20036

RE: MUR 2936
James F. Keenan

Dear Mr. Thomas:

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 Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2004021070

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Richard P. Taylor, Esquire
Steptoe & Johnson
1330 Connecticut Avenue
Washington, D.C. 20036

RE: MUR 2936
Richard P. Taylor

Dear Mr. Taylor:

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 Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2004021071

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Benson Everett Legg, Esquire
Venable, Baetjer & Howard
1800 Mercantile Bank & Trust Bldg.
2 Hopkins Plaza
Baltimore, MD 21201

RE: MUR 2936
Helen Delich Bentley

Dear Mr. Legg:

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 Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

2034031372

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Dolores O. Ridgell
Assistant State Prosecutor
Office of The State Prosecutor
One Investment Place, Suite 100
Towson, Maryland 21204-4120

RE: MUR 2936

Dear Ms. Ridgell:

On July 18, 1990, your office requested information pertaining to the above-referenced enforcement matter. At that time, no information was released to you because of the confidentiality requirements.

This letter is to notify you that the Commission has taken final action and closed the file in this matter. The information that you requested is now a part of the public record and can be released to you. For information on obtaining materials from the file, you should contact Fred Eiland, the Federal Election Commission Press Officer, at (202) 376-3155.

Sincerely,

Lawrence M. Noble
General Counsel

2004081207 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1990

Louis E. Wiser, Jr., Treasurer
Carroll County Republican Central
Committee Federal Account
2810 Gillis Street
Mt. Airy, MD 21771

CLOSED

RE: MUR 2936
Carroll County
Republican Central
Committee Federal
Account

Dear Mr. Wiser:

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 Jeffrey D. Long, the staff member 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

THIS IS THE END OF MUR # 2936

DATE FILMED 11/28/90 CAMERA NO. 4

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2936.

21040313508

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 2, 1990

CLOSED

Joseph M. Getty
P.O. Box 398
Manchester, MD 21102

RE: MUR 2936
Carroll County Republican
Central Committee Federal
Account

Dear Mr. Getty:

At the time we received your September 12, 1990, letter, MUR 2936 was still an open enforcement matter. That matter has now been completely closed. Enclosed are copies of the two conciliation agreements entered into as part of this matter and a copy of the certification for the Commission's decision to take no further action with respect to the Carroll County Republican Central Committee Federal Account. A notification letter was sent at that time to Louis E. Wiser, Jr., regarding this decision by the Commission.

In response to your questions, I would note that generally a finding by the Commission that a political committee has violated the Federal Election Campaign Act of 1971, as amended ("the Act") or Commission regulations applies to the organization and its treasurer and is not affected by any change in the membership of the committee. Because of the unusual circumstances presented in MUR 2936, the Commission instead chose to pursue the alleged violations against the former treasurer of the committee.

If you have any questions regarding this matter, please contact Jeffrey D. Long, the staff member assigned to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures

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