FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3177

DATE FILMED 7/13/92 CAMERA NO. 3

CAMERAMAN EES

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RECEIVED
FEDERAL ELECTION COMMISSION

ALAN LINDSAY
2300 LAZY HOLLOW, # 330-D
HOUSTON, TX 77063
(713) 974-4402

90 NOV 16 AM 11:39

MUR 3177

November 12, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 16 PM 4:05

General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear General Counsel:

It is my belief that the below named respondents have violated FEC regulations and I wish to file a complaint in order that you might compel the below named organization and its officers to comply with the election laws. My belief is based upon personal knowledge obtained as a delegate to that convention and from documentary evidence, some of which is enclosed. This belief is also based upon conversations with other persons who have investigated the respondents.

The respondents are;

RUTH BENNETT
c/o THE INVISIBLE HAND FOUNDATION
P.O. BOX 23114
SEATTLE WA 98102

KAREN ALLARD
6901 NARROWS LANE N.
TACOMA WA 98407

BETTINA CARTER
1205 OLIVE ST. E. #A
SEATTLE, WA 98122

RICHARD SHEPARD
1107 1/2 TACOMA AVENUE SOUTH
TACOMA, WA 98402

DAVID A. JONES
18022 SE 128TH (LAST KNOWN ADDRESS)
RENTON WA 98056

LPWS CONVENTION SERVICES GROUP
(A Washington Corporation)

2204021364 8

The gist of my complaint is that the above named respondents hosted The Presidential Nominating Convention for the Libertarian Party's 1988 general election nominees and failed to file a statement of organization, failed to file quarterly reports and failed to file a post convention report. I believe that these actions violate certain sections of the Code of Federal Elections and the United States Code. I believe that your commission has jurisdiction to compel compliance. The particular codes I believe have been violated are;

CFR 11 9008.1(b)
CFR 11 107.1
CFR 11 9008.12(b);
USC 437

In 1987 Karen Allard, Ruth Bennett, David Jones, Richard Shephard and Bettina Carter, along with other individuals in Washington State organized and hosted the Libertarian Party Presidential Nominating Convention which selected the Libertarian Party's nominees for President and Vice President for the 1988 General Election. That convention was held over the Labor Day weekend of 1987. These people operated as LPWS/Convention Services Group. Although the documentary evidence in this regard is somewhat sparse, this appears to be a subcommittee of the Washington State Libertarian Party. This committee negotiated a contract with the Libertarian National Committee and while that contract was never signed, minutes of LP National Committee Meetings subsequent to that convention show that both groups agreed to the terms of that unsigned contract and that moneys were paid by the Libertarian National Committee to LPWS/CSG in accordance with the terms of that contract until 1989.

LPWS/CSG's spokesperson claims that LPWS/CSG received more than $130,000 in contributions. LPWS/CSG expended funds to promote the convention, the candidates and the Libertarian Party. LPWS/CSG arranged the Convention Banquet and for Convention speakers. Every aspect of the convention was controlled by LPWS/CSG including publicity expenses for both the convention and the candidates.

These facts lead me to believe that LPWS/CSG was and is required to disclose its contributions and expenditures, particularly contributions and expenditures related to the 1987 Libertarian national convention.

I have been assured by staff members at the FEC that no filing has been made by LPWS/Convention Services Group, and I have also been told by associates of Bennett, Carter, Allard et. al. that no filing has been made, and no filing is planned.

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LPWS/CSG continued to make expenditures and receive contributions relating to the September 1987 convention until April 1989. My understanding of FEC regulations leads me to believe that quarterly reports should have been filed until after all convention related business had ceased. Accordingly, I believe that LPWS/CSG became subject to FEC filings no later than January 20, 1987 and that filings should have continued until July 20, 1989.

The enclosed documentation will, I believe, demonstrate that;

1. LPWS-CSG did host the Presidential Nominating Convention which selected the Libertarian Party nominees for President and Vice President for the November 1988 General Election.

2. LPWS-CSG operated and carried out convention related activities during the period beginning November 1986 and ending April 1989.

3. LPWS-CSG received contributions in excess of $130,000 and made expenditures in excess of $110,000.

The Libertarian National Committee has additional records on file which will clearly establish that LPWS/CSG was the host committee and that LPWS/CSG continued to receive contributions related to the Presidential Nominating Convention for the 1988 General Election until early 1989.

The headquarters of the Libertarian National Committee are located at:

1528 Pennsylvania Avenue, SE
Washington, DC 20003

Other persons who may be able to provide detailed information about the convention and LPWS/Convention Services Group are;

Michael Holmes
21715 Park Brook Drive
Katy, Texas 77450

Holmes was a member of the LP Natcom's convention oversight committee and as such he participated in negotiations with LPWS/CSG.

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Honey Lanham
4327 Sexton
Dallas, Texas 75229

Lanham was a member of the LP Natcom's convention oversight committee and as such she participated in negotiations with LPWS/CSG.

James Turney
2214 Hay Road
Richmond, VA 23224

Turney was LP National Chairman and participated in negotiations with LPWS/CSG.

Michael Dunn
3933 S/ 326th Place
Auburn, WA 98001

Dunn was commissioned by the LP Washington State to investigate the handling of funds resulting from activities of LP/WS subcommittee LPWS/CSG.

Kevin Bjornsen
821 N 40th
Seattle, WA 98103

Bjornsen was a delegate to the convention, a contributor to LPWS/CSG and a volunteer.

William Bradford
c/o Liberty Magazine
P.O. BOX 1167
Port Townsend, WA 98368

Bradford was a convention delegate and an exhibitor. He is now a director of the successor organization to LPWS/CSG, The Invisible Hand Foundation. This successor organization was created with the surplus funds remaining from CSG/WS.

Marla Bottemiller
14150 S.E. 17th Place, #B7
Bellevue, WA 98007

Bottemiller is a former Chairperson of the Libertarian Party of Washington State and may be able to provide detailed information regarding the final disposition of LPWS Convention Services Group.

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THOMAS A. OLSEN
339-C FIFTH AVENUE
SAN FRANCISCO, CA 94118

KIMBERLY PEDDICORD
1103 CRESPI DRIVE
PACIFICA, CA 94044

Both Olsen and Peddicord were involved in the Washington State Libertarian Party and have detailed personal knowledge of the affairs of LPWS/CSG.

Thank you for your attention to this matter.

Sincerely,

Alan Lindsay

THE STATE OF TEXAS |

Subscribed and sworn to before me, by the said Alan R. Lindsay this 15th day of November, 1990, certify which, witness my hand and seal of office.

Karen D. White
Notary Public in and for the state of Texas
Karen D. White
My commission expires: September 22, 1992

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Complaint against Ruth Bennett, Karen Allard, Richard Shepard, Bettina Carter and LPWS/Convention Services Group.

This letter from LPWS-CSG Treasurer Bettina (Tina) Carter evidences contributions to LPWS-CSG in excess of $130,000 and expenditures in excess of $110,000.

22040913653

December 23, 1989

Sue Walton
1111 Church Street Unit 405
Evanston, IL 60201

Dear Sue,

I'm sorry it has taken so long for me to respond to your request for expense information in regard to the Seattle 1987 National Convention.

Again, I must reiterate that these figures are approximate. Since it's been 2 years since the convention, I had to reorganize what to put in each category. Here's a brief explanation that may help clarify things: Banquet includes flowers and all the evening's entertainment, including the 50's rock band which played after the formal banquet was over. Program includes the entertainment events as well, the cruise for example. Logistics includes the state signs, walkie talkies (which were indispensible), security, decorations for the exhibit area (lobby), and the cabs which took us to & from the cruise. The director category is salary only, his expenses fall under administration. Additionally, I tried to split the mugs out into banquet expenses and the pens, keyrings, and notebooks into registration. They were lumped together by the supplier and it's been too long to find the invoices. The program tabloid expenses are under registration.

Here are the figures:

Administration	$ 50,660
Program	15,300
Advertising	3,030
Exhibits	290
Registration	9,320
Logistics	5,130
Media	9,960
Director	11,540
Banquet	5,220

110,450
22000 Pmpkt est
132,450 Est. Gross

Sue, I hope this is helpful. Please call or write if I can do anything further or if you need me to explain the above.

The best of luck to you and the rest of the crew! Enjoy!

Sincerely,

Tina

Tina Carter
Treasurer
Invisible Hand Foundation
1205 Olive St. E. #A
Seattle, WA 98122
206-328-6509

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Complaint against Ruth Bennett, Karen Allard, Richard Shepard, Bettina Carter and LPWS/Convention Services Group.

This timeline evidences LPWS-CSG's hosting of the Libertarian Party's Presidential Nominating Convention which selected the party's nominees for the 1988 General Election. This document further evidences the direct relationship between the host committee and the Libertarian National Committee. Paragraph 5 evidences LPWS-CSG's active role in promoting the party, its convention and by extension its nominees. Paragraphs 6 & 7 evidence LPWS-CSG's continued operation and continued convention related activities through March or April 1989.

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CONVENTION SERVICES GROUP/INVISIBLE HAND FOUNDATION TIMELINE

August of 1985, the 1987 National LP Presidential Nominating Convention was awarded to H. Barron Enterprises and the LPWS as a profit making venture. Seattle was the LP National Committee's second choice for the 1987 convention as the organizers of the chosen site, Reno, were unable to do it.

October of 1986, the LPWS officially recognized LP Convention Services as the official entity for producing the 1987 National LP Presidential Nominating Convention. H. Barron Enterprises was deemed incapable of handling the convention by the LPWS Executive Committee. The LP Convention Services would take full responsibility and liability for the 1987 convention. No verbal or written contract was ever discussed, prepared, or signed between the LP Convention Services and the LPWS. The first employee of LP Convention Services was hired, Richard Shepard. His job title was convention director.

December of 1986, the LP Convention Services convention director filed the articles of incorporation under the non-profit laws of the State of Washington, R.C.W. 24.03. The name of the non-profit corporation was to be the Convention Services; named by the officers of the corporation. When the articles were filed with the State of Washington, there already was a Convention Services. The convention director of the LP Convention Services renamed the corporation, LPWS (just the initials) Convention Services Group or LPWS CSG without prior approval of the officers. Officers of the LPWS Convention Services Group were Ruth Bennett, Tina Carter, and David Jones; long time Libertarians. The use of the shortened name CSG was done for convenience.

April of 1987, the LP National Committee appointed a convention oversight committee chair, Honey Lanham. This committee had not been functioning since August of 1985 as the chair, Ruth Bennett resigned at that meeting. The reactivation of this committee enabled the LPWS Convention Services Group to begin formal negotiations with the national LP regarding a contract. The convention oversight committee was charged with the preparation and negotiation of a contract with the LPWS CSG. At this meeting, the LP National Committee passed resolution 326 that would hinder convention organizers from contracting with speakers or exhibitors the LP National Committee did not approve. By this time, much of the 1987 convention program, speakers, and exhibitors were confirmed and contracts had been signed.

September of 1987, the Seattle National LP Presidential Nominating Convention was a success. Tonie Nathan, employed as media coordinator for the LPWS CSG, was successful in getting media attention for the National LP and the 1987 convention. The LPWS CSG's convention director was fired on September 2, 1987 by the LPWS CSG for failure to perform his assigned duties. The main volunteers

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(unpaid) for the convention included. Ruth Bennett, Tina Carter, David Jones, Tom Tanaka, Howard Cherry, and Karen Allard. There were several LPWS members, National LP members, and non-libertarian friends who assisted with on-sight logistics such as introducing speakers, working at the LPWS booth, monitoring the speaking events, participating in the talent show, babysitting, working in the office, and other tasks. No contract was ever signed between the LPWS CSG and the National LP.

October of 1987, LPWS CSG issued a bill to the National LP for photocopying National LP documents and expenses accrued by the media director, Tonie Nathan.

January of 1988, a settlement proposal given by the LP National Committee was accepted by the LPWS CSG. The sum of $2,901.78 would be paid to the LPWS CSG in installments. It took until March of 1989 for the National LP to complete payments to the LPWS CSG and then, final payment was made to Tonie Nathan by the LPWS CSG.

March of 1989, Ruth Bennett and Tina Carter were the remaining officers of the LPWS CSG. David Jones moved to Oregon and was not active in the LPWS CSG. At the March meeting, the articles of incorporation and the bylaws were reviewed. It was discussed whether the LPWS CSG should dissolve at this time or continue as a corporation. The governing documents clearly stated this was a legal possibility. There was also discussion about a more suitable name and the benefits of a 501(c)(3) foundation. It was agreed that the profits from the convention would be used more appropriately and effectively if they were left with LPWS CSG. It was also agreed the profits would be used to further the cause of liberty in Washington through educational avenues. The LPWS CSG officers believed a foundation would be complimentary to the work done by the political organization, the LPWS. The LPWS CSG had invited Karen Allard and Jack Allard to attend the March meeting and give their input as private citizens. No formal announcement or news release was issued regarding the decisions made at the meeting. An announcement was planned at a later time when more research into the foundation status and consultation with the accountant and lawyer were complete.

August of 1989, Richard Shepard, fired employee of the LPWS CSG began writing letters to the officers of the LPWS CSG and the LPWS protesting the decision made by the LPWS CSG and demanding information. The name Invisible Hand Foundation was chosen to replace the name LPWS CSG purely for public appeal. The accountant was assisting with the paperwork to file for a 501(c)(3) foundation. New board members were elected: Ruth Bennett, president; Karen Allard, vice-president; Tina Carter, treasurer; and Jack Allard, secretary.

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September of 1989, Richard Shepard continued with his letters and demands. Michael Dunn, a long time Libertarian, was asked to review documents and interview 9 individuals regarding the LPWS CSG/IHF and the LPWS relationship. The LPWS Chair, Marla Bottemiller set the rules and stated these in a letter sent to Michael Dunn. The IHF officers also set their parameters and corresponded by letter with the chair of the LPWS, Marla Bottemiller.

March of 1990, a 129 page report was issued by Michael Dunn, discussing the relationship. Michael Dunn issued opinions, a summary, conclusions; based on heresay and inference. Michael Dunn went beyond the scope, direction, and intent of the investigation; did not talk with all the people he was directed to interview so he wasn't able to understand the history, and made false accusations against former and current LPWS members and current IHF officers.

April of 1990, the Invisible Hand Foundation prepared and presented a proposal to the LPWS Executive Committee repudiating the report and charges rendered, announced the opening of 5 new board positions on the IHF to be announced at the May board meeting, and agreed to assist the LPWS with incorporation. The LPWS SEC and the board members of the IHF met to discuss the report commissioned by the LPWS SEC and submitted by Michael Dunn. Verbal and written testimony was presented to repudiate the charges and to give a clear and accurate account of the history behind the 1987 convention and LPWS CSG. Proposal given by the IHF to the LPWS SEC was approved 8 to 2 and signed by 2 officers of the LPWS SEC and 2 board members of the IHF.

May of 1990, board meeting of the Invisible Hand Foundation. Packets describing the IHF purpose, projects, and board members were handed out. The next Invisible Hand Foundation board meeting will be held in August of 1990.

- Kar[illegible]
[illegible] May [illegible]

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Complaint against Ruth Bennett, Karen Allard, Richard Shepard, Bettina Carter and LPWS/Convention Services Group.

These incorporation documents with amendments detail the transformation of LPWS-CSG into a not-for-profit charitable foundation. These documents show that LPWS-CSG and the Invisible Hand Foundation are one and the same entity.

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Attachment C1

FILED

DEC 23 1986

SECRETARY OF STATE
STATE OF WASHINGTON

ARTICLES OF INCORPORATION

* * * * * *

The undersigned, for the purpose of forming a corporation under the nonprofit laws of the State of Washington, R.C.W. 24.03, hereby adopts the following Articles of Incorporation.

ARTICLE I

The name of the corporation shall be:

LPWS Convention Services Group

ARTICLE II

The term of existence shall be perpetual.

ARTICLE III

The purposes for which the corporation is organized are as follows: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 U.S.C. Section 527), as amended, and, any other lawful purpose that political organizations may engage in.

ARTICLE IV

The name of the Registered Agent of the corporation is:

RICHARD SHEPARD

The street address of the Registered Office, which is also the address of the Registered Agent, is as follows:

514 North 11th, #2
Tacoma, Washington 98403

The post office box number, which may be used in conjunction with the Registered Agent address, is:

ARTICLE V

There shall be three (3) directors serving as the initial Board of Directors. Their names and addresses are as follows:

DIRECTOR Ruth E Bennett 2405 Terrace Dr Puyallup Wa 98372

DIRECTOR David A Jones 18022 SE 128th Renton Wa 98056

DIRECTOR Bettina R. Carter 1205 Olive St E #A Seattle Wa 98122

ARTICLE VI

In the event of dissolution of the corporation, the net assets are to be distributed as follows: To the Libertarian Party of Washington State for its use in functions exempt from Federal Tax under the authority of 26 U.S.C. Section 527, as amended.

ARTICLE VII

The names and addresses of each incorporator is as follows:

Ruth E Bennett 2405 Terrace Dr Puyallup Wa 98372
David A Jones 18022 SE 128th Renton Wa 98056
Bettina R Carter 1205 Olive St E Apt A Seattle Wa 98122

IN WITNESS WHEREOF, each incorporator has affixed his/her signature on this 22d day of December, 1986.

Ruth E Bennett _____

David A Jones _____

Bettina R Carter _____

CONSENT TO APPOINTMENT AS REGISTERED AGENT

I, RICHARD SHEPARD, hereby consent to serve as Registered Agent, in the State of Washington, for the corporation herein named. I understand that as agent for the corporation, it will be my responsibility to receive Service of Process in the name of the corporation; to forward all mail to the corporation; and to immediately notify the Office of the Secretary of State in the event of my resignation or of any change in the Registered Office address of the corporation for which I am agent.

DATED this 22d day of December, 1986.

Richard Shepard
Registered Agent

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MINUTES OF THE ORGANIZATIONAL MEETING

OF THE BOARD OF DIRECTORS

OF

LPWS-CONVENTION SERVICES GROUP

The organizational meeting of the Board of Directors of LPWS - Convention Services Group, a Washington nonprofit corporation, was held at 431 Rainier Ave S Renton, Washington, on the 21st day of February, 1987, pursuant to call by Ruth Bennett, an incorporator of the corporation. All of the initial Board of Directors of the corporation named in the Articles of Incorporation were present in person, they being Ruth Bennett, David Jones and Bettina Carter. Also present was Richard Shepard. Each director waived notice of the meeting.

Ruth Bennett presided as Chairman of the meeting and David Jones acted as Secretary of the meeting and recorded the Minutes.

The Chairman stated that the meeting was called pursuant to RCW 24.03.135 to adopt bylaws, elect officers and appoint a registered agent, designate a registered office and transact such other business as may come before the meeting.

The Chairman reported that on December 23, 1986, the Secretary of State of the State of Washington, following the filing of the Articles of Incorporation of the corporation issued a Certificate of Incorporation pursuant to RCW 24.03.145.

There ensued a discussion concerning the matters for consideration, after which, upon motion duly made, seconded and carried, the following resolutions were unanimously adopted by the Board of Directors of the corporation:

1. RESOLVED the Bylaws consisting of six pages inserted in the minute book of this corporation following the Articles of Incorporation are hereby adopted as the Bylaws of this corporation.

2. FURTHER RESOLVED that the following are hereby elected as officers of this corporation to serve until the next annual meeting of directors and until the election and qualification of their successors:

President	Ruth Bennett
Vice President/Secretary	David Jones
Treasurer	Bettina Carter

3. FURTHER RESOLVED that the President, the Secretary or the Treasurer of the corporation are hereby authorized to execute on behalf of the corporation any and all forms of bank resolutions dealing with corporate banking matters, including the establishing and maintaining of corporate bank accounts, which in their judgment from time to time may be required for the proper fiscal management of the corporation, including

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the designation thereon of such authorized signatures of corporate officers as may to them seem appropriate. The said officers may execute such banking resolution or resolutions as if authorized to do so by a specific resolution of the Baord of Directors adopted on the date this resolution was adopted by the Board. A copy of any such banking resolutions shall be placed in the corporate minute book.

4. FURTHER RESOLVED that the registered office of this corporation is hereby designated to be 610 South J Street, Tacoma, Washington 98405.

5. FURTHER RESOLVED that Richard Shepard is hereby appointed as the registered agent of this corporation, and that such registered agent is an individual residing in the State of Washington whose business office is the same as that of the above designated registered office of this corporation.

6. FURTHER RESOLVED that the President or Vice President is hereby directed to execute a statement of the aforesaid designation of registered office and appointment of registered agent, and the Secretary is hereby directed to certify as true these resolutions and to file such statemnt with such certified resolutions and written consent of the registered agent to serve, with the Secretary of State of the State of Washington.

Following the adoption of the foregoing resolutions and there

being no further business to come before the meeting for consideration, it was duly adjourned subject to call by the President.

Respectfully submitted,

David Young

Approved:

David Young

Ruth E. Belmont

William F. Casey

22409 3/6/86

BYLAWS

OF

LPWS-CONVENTION SERVICES GROUP

A Washington Nonprofit Corporation

ARTICLE I - BOARD OF DIRECTORS

Section 1. There shall be no members of this corporation.

Section 2. The management and administration of the affairs of this corporation shall be a board of directors which shall be a self-perpetuating body. Any member of the board of directors may make recommendations to the board as to persons eligible for membership. Any person so recommended may be elected to membership by a unanimous vote of the board of directors. The board of directors shall consist of not less than three persons who shall be elected to serve terms of three years each and until their successors have been elected and qualified.

Section 3. Within the limits of Section 1 hereof, the number of directors may be changed at any time by a unanimous vote of the directors at any regular meeting or at any special meeting called in whole or in part for that purpose.

Section 4. Sixty-six percent of the members of the board of directors shall constitute a quorum.

Section 5. The board of directors may by resolution delegate such authority to one or more of the directors as it deems necessary or appropriate for the carrying out of the objects of the corporation.

Section 6. In the event of a vacancy on the board of directors the remaining directors by majority vote may elect a successor to fill the unexpired term. If there only be one director serving, he may elect successors to fill the unexpired terms of vacant positions on the board. If all positions are vacant by reason of death or otherwise, the Superior Court of any county in the state of Washington shall have authority to appoint persons to fill such vacancies, such persons to be selected for their interest and ability to carry out the purpose of the corporation.

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ARTICLE II - OFFICERS

Section 1. The elected officers of the corporation shall be a president, a vice president, a secretary and a treasurer, each of whom shall be elected by the board of directors at its organizational meeting. Any two or more offices may be held by the same person, except the offices of president and secretary. Each officer will serve for a period of three years following his election and until his successor shall have been elected and qualified. In the event of a vacancy, the board may elect a successor to fill the unexpired term.

Section 2. The duties of the president, vice president, secretary

and treasurer shall be such as are usually imposed upon such officials of corporations and as are required by law and such as may be assigned to them respectively by the board from time to time, but checks upon any bank account of the corporation shall be signed only by a member of the board of directors or such person as the board may from time to time appoint by an appropriate resolution.

ARTICLE III - CHARITABLE DISTRIBUTIONS

Subject to the Articles of Incorporation and applicable law, the funds of the corporation may be distributed only for the following purposes: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 USC Section 527) as amended, and, any other lawful purpose that political organizations may engage in.

ARTICLE IV - MEETINGS

Section 1. The annual meeting of the board of directors shall be held on the first Monday in the month of January.

Section 2. Special meetings of the board of directors shall be held upon the call of the president or upon the written request and ten days notice in writing signed by thirty-three percent of the members of the board.

Section 3. Each director shall be entitled to cast one vote at any election or on any subject before any annual or special meeting of the directors.

Section 4. Notice of any meeting of the board may be waived in writing by any director at any time.

ARTICLE V - INDEMNIFICATION

Section 1. Any person who is made or was a party or is threatened to be made a party to any threatened, pending or completed action, suit, or proceeding, whether civil, criminal, administrative, or investigative, by reason of the fact that he is or was a director or officer of this corporation or is or was serving at the request of this corporation or is or was serving at the request of this corporation as a director, trustee, officer, employee, or agent of another corporation, partnership, joint venture, trust or other enterprise, shall be indemnified against expenses (including attorneys fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred by him in connection with such action, suit, or proceeding, if he acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interests of the corporation and with respect to any criminal action or proceeding had no reason to believe his conduct was unlawful. In any action or suit by or in the right of this corporation to procure a judgment against such a person, no indemnification shall be made in respect of any claim, issue or matter as to which he shall have been

adjudged to be liable for negligence or misconduct in the performance of his duty to the corporation unless and only to the extent that the court in which such action or suit was brought shall determine upon application that, despite an adjudication of liability, he is fairly and reasonably entitled to indemnity for such expenses which such court shall deem proper. On request of such person who is made or is threatened to be made a party to any such suit, this corporation shall enter into an agreement confirming the foregoing indemnity subject to limitations as provided by law in such instances. The indemnification herein provided for shall continue as to a person who has ceased to be a director or officer of this corporation shall inure to the benefit of his heirs, executors, and administrators and shall be in addition to rights of indemnification provided by law.

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Section 2. This corporation shall pay expenses incurred in defending a civil or criminal action, suit, or proceeding against which a person shall be entitled to indemnification under Section 1 of Article VI in advance of a final disposition of such action upon receipt of an undertaking by or on behalf of the person to repay such amount if the person is not entitled to indemnification as provided by law.

Section 3. This corporation may purchase and maintain insurance on behalf of any person who is or was a director, trustee, officer, employee, or agent of the corporation, or is or was serving at the request of the corporation as a director, trustee, officer, employee

or agent of another corporation, partnership, joint venture, trust, or other enterprise against any liability asserted against him and incurred by him in any such capacity or arising out of his status as such, whether or not the corporation has or would have the power to indemnify him against such liability under law.

ARTICLE VI - AMENDMENTS TO BYLAWS

These bylaws may be altered, amended or repealed and new bylaws may be adopted by majority vote of the board of directors.

CERTIFICATION

I certify the foregoing is an exact copy of the bylaws of LPWS-Convention Services Group which wre adopted unanimously by the board of directors on FEB 21, 1987.

SECRETARY

Attachment C2

OUTLINED IN RCW 24.03.302. NON-PROFIT CORPORATIONS FAILING TO FILE AN ANNUAL REPORT SHALL BE ADMINISTRATIVELY DISSOLVED

PROFIT CORPORATION ANNUAL REPORT

JST BE FILED BETWEEN JAN 1 AND MARCH 1, 1987

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (PM-21)
OLYMPIA, WA. 9850[illegible]

CORPORATION #	TRANS	STATE OF INC.
381457-7	LOF	WA

FILING FEE $5.00

AMOUNT REC'D	DATE RECEIVED	BY

CORPORATION NAME
LPMS CONVENTION SERVICES GROUP

X RICHARD SHEPARD
~~514 N 11TH ST~~
610 South J St
TACOMA WA 98405

* NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
RICHARD SHEPARD

* REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X RICHARD SHEPARD
~~514 N 11TH ST~~
610 South J St
TACOMA WA 98405

* AN ANNUAL REPORT MUST BE FILED EVERY YEAR BEFORE MARCH 1ST.

THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE. PLEASE DICATE THE PROPER NAME/ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS:

CHANGE(S) ABOVE (AUTHORIZED BY ADOPTED RESOLUTION OF BOARD OF DIRECTORS) EFFECT AS OF	NEW REGISTERED AGENT (NAME)
REGISTERED OFFICE ADDRESS: 610 South J St, Tacoma Wa 98405	SIGNATURE OF NEW REGISTERED AGENT INDICATING ACCEPTANCE OF THE APPOINTMENT X/s/

A POSTOFFICE BOX IS NOT ACCEPTABLE UNLESS SHOWN WITH THE PHYSICAL LOCATION IN THE SAME CITY

NUAL REPORT	FILL IN ALL SPACES — PLEASE TYPE OR PRINT LEGIBLY				
ESS OF PRINCIPAL PLACE USINESS IN WASHINGTON ONE. WRITE NONE)	None				
IGN CORPORATIONS ADDRESS OF PRINCIPAL OFFICE IN E OR COUNTRY OF INCORPORATION	N/A				
LY STATE NATURE OF THE IESS WHICH THE CORPORATION NDUCTING IN WASHINGTON	Political				
S AND ADDRESSES OF ERS AND DIRECTORS OF ORPORATION	PRESIDENT	STREET	CITY	STATE	ZIP CODE
	Ruth Bennett	2405 Terrace Dr	Puyallup	Wa	98372
	VICE PRESIDENT	STREET	CITY	STATE	ZIP CODE
	David Jones	221 SW 153d St #114	Seattle	Wa	98166
	SECRETARY	STREET	CITY	STATE	ZIP CODE
	David Jones	"	"	"	"
	TREASURER	STREET	CITY	STATE	ZIP CODE
	Bettina Carter	1205 E Olive St #A	Seattle	Wa	98122
	DIRECTORS	STREET	CITY	STATE	ZIP CODE

(ATTACH ADDITIONAL SHEET IF NECESSARY)

ATURE AND TITLE OF SIDENT OR VICE-PRESIDENT SECRETARY OR TREASURER	TITLE	DATE
X Ruth E Bennett	President	2/5/87

FILING FEE $5.00 MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. DO NOT SEND CASH.

Mailed 2/26/87 by AK #500

Attachment C2

AS OUTLINED IN RCW 24.03.260, NON-PROFIT CORPORATIONS FAILING TO FILE AN ANNUAL REPORT SHALL BE ADMINISTRATIVELY DISSOLVED

NON PROFIT CORPORATION ANNUAL REPORT

MUST BE FILED BETWEEN JAN 1 AND MARCH 1, 1987

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (PH-11)
OLYMPIA, WA. 98504

00224MAR 587

CORPORATION #	TRANS	STATE OF INC	FILING FEE $5.00	AMOUNT REC'D	DATE RECEIVED	BY
B-301487-7	LBF	WA		5.00	2-26-87	KM

CORPORATION NAME
LEWIS CONVENTION SERVICES GROUP

X RICHARD SHEPARD — Resigned 9/25/87
610 South T St
TACOMA WA 98405

(ADT)

* NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
RICHARD SHEPARD

* REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X RICHARD SHEPARD
610 South T St
TACOMA WA 98405

1987

* AN ANNUAL REPORT MUST BE FILED EVERY YEAR BEFORE MARCH 1ST.

IF THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE, PLEASE INDICATE THE PROPER NAME ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS.

(2) 610 South T St, Tacoma Wa 98405 X Richard Shepard

A POST OFFICE BOX IS NOT ACCEPTABLE UNLESS USED WITH THE PHYSICAL LOCATION OF THE BUSINESS IN THE SAME CITY

ANNUAL REPORT — FILL IN ALL SPACES — PLEASE TYPE OR PRINT LEGIBLY

None
N/A
Political

NAMES AND ADDRESSES OF	STREET	CITY	STATE	ZIP CODE
Ruth Bennett	2405 Terrace Dr	Royally	Wa	98372
David Jones	221 SW 153.1 St	Seattle	Wa	98166
David Jones	"	"	"	"
Bettina Carter	1205 E Olive St	Seattle	Wa	98122

(ATTACH ADDITIONAL SHEET IF NECESSARY)

TITLE: President — DATE: 21 FEB 87

FILING FEE $5.00 — MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. — DO NOT SEND CASH.

6 0 0 4 0 9 1 3 6 7 4

Attachment C4

FILED

SEP 28 1987

SECRETARY OF STATE
STATE OF WASHINGTON

The Culture of Freedom

Libertarian Presidential Nominating Convention
Seattle Sheraton Hotel September 2, 3, 4, 5, 6, 1987

September 11, 1987

To: Secretary of State
Corporation Records
Olympia, WA 98504

Re: LPWS-CSG Registered Agent

Dear Sir:

Please be advised that as of September 2, 1987 I have resigned as Registered Agent for LPWS-Convention Services Group, a non-profit Washington corporation. Please contact the officers of said corporation for advice on my replacement.

Very truly yours,

RICHARD SHEPARD
610 South J Street
Tacoma, WA 98405
(206) 627-3545

RS/cb

cc: LPWS-CSG

RESIGNATION OF REGISTERED AGENT

P.O. Box 23108 Seattle, WA 98102

LOF 3/5/87 PURGE: 11/[illegible]/87

Attachment C5

SECRETARY of STATE

Corporations Division
2nd Floor, Republic Bldg
505 E. Union
Olympia, WA 98504
Information (206) 753-7115
Receptionist (206) 753-7120

TO: LPWS-CONVENTION SERVICES GROUP
% Ruth Bennett , President
2405 Terrace Dr.
PUYALLUP, WA 98372

DATE: SEPTEMBER 29, 1987

FROM: Corporations & Trademarks Division

RE: Resignation of Registered Agent. Change of Registered office address.

This office has just been notified of the resignation of Richard Shepard, who is shown on our records as the registered agent for your corporation at the registered office address of 610 South J St. TACOMA, WA 98405.

According to RCW 2403, the corporation has 45 days from the date of this notice to appoint a new registered agent and/or designate its current registered office address in the state of Washington. We have enclosed forms for completing this filing.

PLEASE BE ADVISED THAT FAILURE TO MEET THE FILING DEADLINE WITHIN THE 45 DAY PERIOD WILL RESULT IN ADMINISTRATIVE DISSOLUTION OF THE CORPORATION OR REVOCATION OF THE CERTIFICATE OF AUTHORITY TO DO BUSINESS IN WASHINGTON AS OF Nov. 18, 1987.

If you have any questions regarding completion of the enclosed forms or the filing requirements, please do not hesitate to contact this office between the hours of 8:00 a.m. to 11:00 a.m. and 1:00 p.m. to 3:30 p.m. at (206) 753-7115.

By: Tobi L. Snyder
(Corporations clerk)

ssf 13 (8/84)

9204021367 6

SECRETARY of STATE

RECEIVED
SECRETARY OF STATE
STATE OF WASHINGTON
NOV 12 1987
CK $5.00 CASH ____
TR R01 AMT 5.00

00207 NOV 16 87
Attachment C7
FILED
12 NOV 1987
SECRETARY OF STATE
STATE OF WASHINGTON

NON PROFIT CORPORATION STATEMENT OF CHANGE **FILING FEE $5.00**

The undersigned submits the following statement to change the corporation's Registered Agent, Registered Office address, or both in accordance with RCW 24, Washington Nonprofit Corporation Act.

1. NAME OF CORPORATION: LPWS-CONVENTION SERVICES GROUP.

X2. IF CHANGING REGISTERED AGENT:
Name of new/successor Registered Agent: (1) Thomas T Tanaka Jr.

AGENT'S CONSENT TO APPOINTMENT

X3. I hereby consent to serve as Registered Agent. I will accept and forward mail and Service of Process to the corporation. I will notify the Secretary of State of my resignation as Agent or of an address change.

X 11-10-87 (Date) X Thomas T Tanaka Jr (Signature of new agent designated on line 2)

X4. REGISTERED OFFICE ADDRESS:
The Registered Office address must be identical to the business address of the Registered Agent and must be located in the State of Washington. A post office box may be used in conjunction with the street address. However, the post office box must be in the same city as the Registered Office address.

(2) X1205 Olive St. E*A (4) Seattle WA 98122.
(street and # or rural route and box #, city, state and zip code)

☐ check this box to indicate if above is an address change.
Post Office box: _____.

X5. COMPLETE ONE OF THE FOLLOWING STATEMENTS:

(a) The change of Agent was authorized by a resolution duly adopted by the Board of Directors and becomes effective on: 11/10/87.

(b) The only change to be recorded is the relocation of the Registered Office, within the State of Washington.* The Registered Agent notified the secretary of the corporation of the address change on: _____.

IN TESTIMONY WHEREOF, this statement is signed by the President or a Vice-President, the Secretary or the Treasurer of the corporation.

X11/10/87 (date) X Barbara L Crafter (signature of an officer of the corporation)* X treasurer (title)

*(In the event the only change to be recorded is the relocation of the Registered Office, the Registered Agent is authorized to sign.)

Return completed forms to: Secretary of State, Corporations Division, 505 E. Union (PM-21), Olympia, Washington 98504.

ssf 115 (R 4/86)

Attachment C15

NON PROFIT CORPORATION ANNUAL REPORT

Seattle/ck 1/25/89

MUST BE FILED BETWEEN JAN 1 AND MARCH 1, 1989

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (PM 21)
OLYMPIA, WA 98504

UBI	TRANS	STATE OF INC
	LOF	WA

FILING FEE $5.00

AMOUNT REC'D	DATE RECEIVED	BY

CORP 2-381457-7

CORPORATION NAME

LPUB CONVENTION SERVICES GROUP

* NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
THOMAS T TANAKA JR

* REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
* THOMAS T TANAKA JR
1205 OLIVE ST E 8A
/
SEATTLE WA 98122

* THOMAS T TANAKA JR
1205 OLIVE ST E 8A
/
SEATTLE WA 98122

THE ANNUAL REPORT MUST BE COMPLETED AND FILED BEFORE MARCH 1ST.
CORPORATIONS FAILING TO FILE THE REPORT WITHIN TIME SPECIFIED SHALL BE DISSOLVED

COMPLETE IF REGISTERED AGENT OR ADDRESS PRINTED ABOVE HAS CHANGED—BELOW ACTIONS AUTHORIZED BY THE BOARD OF DIRECTORS

NEW REGISTERED OFFICE ADDRESS _____ NEW REGISTERED AGENT'S NAME _____

EFFECTIVE DATE: _____ CONSENT TO APPOINTMENT X _____

A POST OFFICE BOX ALONE IS NOT ACCEPTABLE UNLESS SHOWN WITH THE PHYSICAL LOCATION IN THE SAME CITY.

ANNUAL REPORT

IMPORTANT — ALL INFORMATION REQUESTED MUST BE ENTERED, INCLUDING FULL ADDRESS AND ZIP CODE PRINT OR TYPE ALL INFORMATION EXCEPT SIGNATURES

ADDRESS OF PRINCIPAL PLACE OF BUSINESS IN WASHINGTON None

TELEPHONE NUMBER OF CORPORATION (206) 325 6564

BRIEFLY STATE NATURE OF BUSINESS IN WA Political

LIST NAME AND RESPECTIVE ADDRESS OF CORPORATE OFFICERS AND DIRECTORS—COMPLETE EACH LINE OR WRITE NA IF NONAPPLICABLE

	NAME	STREET	CITY	STATE	ZIP CODE
PRESIDENT	Ruth Bennett	43 Bridge #2	Tekoa	WA	99033
VICE-PRESIDENT	Dave Jones	221 SW 153rd St #114	Seattle	WA	98166
SECRETARY	Dave Jones	"	"	"	"
TREASURER	Bettina Carter	1205 Olive St E #A	Seattle	WA	98122
DIRECTORS					
(Attach list of additional directors)					

FOREIGN CORPORATIONS ONLY: Enter (a) Address of principal office wherever located and (b) state or country of incorporation

(a) (b)

X Bettina L Carter — Treasurer — 2/24/89

SIGNATURE OF OFFICER (Pres., V Pres., Sec. or Treas.) TITLE DATE

MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. DO NOT SEND CASH.

LPUB CONVENTION SERVICES GROUP Corporation Number 2-381457-7

We are currently engaged in an effort to check the information used to clearly identify and maintain your corporation's file, and would like to ask for your cooperation in providing the information below. Thank you for assisting us with the records upgrade project

(1) Is this corporation has an exemption from Federal Income Tax, please enter the Federal Identification Number
_ _ _ _ _ _ _ _ _ (if none, write "none")

(2) If this corporation is registered with the Department of Revenue for payment of B and O taxes or remittance of retail sales taxes, please enter the taxpayer registration number _ _ _ _ _ _ _ _ _

(3) If this corporation solicits funds for charitable purposes from the general public, is it registered as a Charitable Organization with the Charities Division of the Office of the Secretary of State? ___yes ___no

001 120 786 SEC 120

2240913678

...SEC. NON-PROFIT CORPORATIONS FAILING TO FILE AN ANNUAL REPORT SHALL LOSE THEIR CORPORATE STATUS

...QUENCY NOTICE

...IT CORPORATION ANNUAL REPORT

Attachment C11

MUST BE FILED BY 5/10/88

00418 MAY 5 88

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION AVENUE (PM-21)
OLYMPIA, WA 9[illegible]

CORPORATION #	TRANS	STATE OF INC
2-381437-7	LOF	WA

FILING FEE $5.00

AMOUNT RECD	DATE RECEIVED	BY
5.00	4-26-[illegible]	[illegible]

CORPORATION NAME
LPMS CONVENTION SERVICES GROUP
X THOMAS T TANAKA JR
1205 OLIVE ST E 9A

SEATTLE WA 98122

1988

REGISTERED AGENT IN STATE OF WASHINGTON

THOMAS T TANAKA JR

REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X THOMAS T TANAKA JR
1205 OLIVE ST E 9A

SEATTLE WA 98122

OUR RECORDS INDICATE THIS FIRM'S ANNUAL REPORT HAS NOT BEEN FILED. FAILURE TO COMPLETE THIS FILING BY TH DATE SHOWN ABOVE WILL RESULT IN ADMINISTRATIVE DISSOLUTION OF THE CORPORATION OR REVOCATION OF IT CERTIFICATE OF AUTHORITY.

IF THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE, PLEASE INDICATE THE PROPER NAME/ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS:

THE CHANGE(S) ABOVE WAS(WERE) AUTHORIZED BY DULY ADOPTED RESOLUTION OF THE BOARD OF DIRECTORS) TAKE EFFECT AS OF	NEW REGISTERED AGENT (NAME)
NEW REGISTERED OFFICE ADDRESS	SIGNATURE OF NEW REGISTERED AGENT EVIDENCING ACCEPTANCE OF THE APPOINTMENT X

P.O. BOX IS NOT ACCEPTABLE UNLESS SHOWN WITH A REGISTERED OFFICE STREET ADDRESS IN SAME CITY.

ANNUAL REPORT	FILL IN ALL SPACES PLEASE TYPE OR PRINT LEGIBLY			
ADDRESS OF PRINCIPAL PLACE OF BUSINESS IN WASHINGTON (IF NONE, WRITE NONE)	none			
FOREIGN CORPORATIONS GIVE ADDRESS OF PRINCIPAL OFFICE IN STATE OR COUNTRY OF INCORPORATION				
BRIEFLY STATE NATURE OF THE BUSINESS WHICH THE CORPORATION IS CONDUCTING IN WASHINGTON	Inactive			
NAMES AND ADDRESSES OF OFFICERS AND DIRECTORS OF THE CORPORATION	PRESIDENT: Ruth Bennett	STREET: 43 Broadway #2	CITY: Tacoma	STATE: WA ZIP CODE: 98402
	VICE-PRESIDENT: David Jones	STREET: 221 SW 153rd #A114	CITY: Seattle	STATE: WA ZIP CODE: 98166
	SECRETARY:	STREET:	CITY:	STATE: ZIP CODE:
	TREASURER: Bettina Carter	STREET: 1205 Olive St E	CITY: Seattle	STATE: WA ZIP CODE: 98122
	DIRECTORS:	STREET:	CITY:	STATE: ZIP CODE:
	(ATTACH ADDITIONAL SHEET IF NECESSARY)			
SIGNATURE AND TITLE OF PRESIDENT OR VICE-PRESIDENT OR SECRETARY OR TREASURER	Bettina Carter	TITLE: Treasurer		DATE: 4/23/88

FILING FEE $5.00 DO NOT SEND CASH 0008 0021 0000 0603 MAKE CHECKS PAYABLE TO STATE OF WASHINGTON

SEC-023

Attachment C18

SECRETARY of STATE

Corporations Division
2nd Floor, Republic Bldg.
505 E. Union
Olympia, WA 98504
Information (206) 753-7115
Receptionist (206) 753-7120

TO: INVISIBLE HAND FOUNDATION
1205 OLIVE ST E APT A
SEATTLE WA 98122

ATTN T TANAKA

DATE: 9-13-89

FROM: Corporations, Trademarks & Limited Partnership Division
505 E. Union, PM-21, Olympia, WA 98504

RE: LPWS CONVENTION SERVICES GROUP

We regret that we must return the above listed document(s) for the following corrections:

AMENDMENTS FOR NONPROFIT CORPORATIONS MAY BE ADOPTED BY THE DIRECTORS ONLY IF THERE ARE NO MEMBERS OR NO MEMBERS HAVING VOTING RIGHTS. IF SUCH IS THE CASE, THAT FACT MUST BE INDICATED IN THE ARTICLES OF AMENDMENT. IF THERE ARE MEMBERS WITH VOTING RIGHTS, THEY MUST ADOPT THE AMENDMENTS. I HAVE ENCLOSED SAMPLE FORMS FOR YOUR USE IF YOU WISH.

We will be able to proceed with the filing(s) as provided by law upon receiving the corrected documents, together with all fees due. Please review your documents to ensure that you have completed all additional actions called for before you resubmit them for filing.

enc: ARTS OF AMEND; CHECK $10.00

By: ANN

ssf 35 (R 2/88)

...ice of Secretary of State
Corporations Division

ARTICLES OF AMENDMENT

WASHINGTON NONPROFIT CORPORATION ACT - 24.03

Pursuant to the provisions of RCW 24.03 of the Washington Nonprofit Corporation Act, the undersigned adopts the following Articles of Amendment to the Articles of Incorporation:

(1) The name of record of the corporation is: _____

LPWS Convention Services Group

_____

(2) The following amendment(s) to the articles of incorporation was(were) adopted on: August 21, 1989:

Y 2 0 4 0 7 1 3 6 3 1

(3) Check and complete one of the following applicable statements:

( ) _____ was the date of the meeting of members at which the amendment was adopted. A quorum was present at the meeting and the amendment received at least two-thirds of the votes which members present or represented by proxy were entitled to cast.

( ) The amendment was adopted by a consent in writing by all members entitled to vote thereto.

(X) There are no members, or no members having voting rights. The amendment received a majority vote directors in office at a meeting of the board held on August 21, 1989.

9/21/89 (Date)

Tina Carter Treasurer (Signature and title of officer)

922408213682

FILING FEE $10.00 FILE IN DUPLICATE

STATE of WASHINGTON SECRETARY of STATE

I, Ralph Munro, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

CERTIFICATE OF AMENDMENT

to

LPWS CONVENTION SERVICES GROUP

a Washington Non Profit corporation. Articles of Amendment were filed for record in this office on the date indicated below.

Amending Articles III and VI; Changing registered agent/address to: Tom Tanaka, 1205 Olive Street E, Apt. A, Seattle, WA 98122; and Changing name to THE INVISIBLE HAND FOUNDATION

Corporation Number: 2-381457-7 Date. September 25, 1989

Given under my hand and the seal of the State of Washington, at Olympia, the State Capitol.

Ralph Munro, Secretary of State

SSF 58

Office of Secretary of State
Corporations Division

Attachment C18

FILED

SEP 25 1989

SECRETARY OF STATE
STATE OF WASHINGTON

ARTICLES OF AMENDMENT

WASHINGTON NONPROFIT CORPORATION ACT - 24.03

Pursuant to the provisions of RCW 24.03 of the Washington Nonprofit Corporation Act, the undersigned adopts the following Articles of Amendment to the Articles of Incorporation:

(1) The name of record of the corporation is: _____

LPWS Convention Services Group

_____

(2) The following amendment(s) to the articles of incorporation was(were) adopted on: August 21, 1989:

SEE ATTACHED LIST OF AMENDMENTS

? ? - 4 0 7 1 3 6 8 4

ssf 77-1 (R 11/84)

Amendments to the Articles of Incorporation for the [redacted]S Convention Services group

ARTICLE I

The name of the Corporation shall be: The Invisible Hand Foundation

ARTICLE III

The corporation is organized exclusively for educational, charitable, scientific and literary purposes, within the meaning of Section 501(c) (3) of the Internal Revenue Service

ARTICLE IV

The name of the registered Agent of the corporation is:

Tom Tanaka

The street address of the Registered Office, which is also the address of the Registered Agent is as follows:

1205 Olive Street East, Apt. A
Seattle, WA 98122

ARTICLE VI

In the event of dissolution of the corporation, the net assets will be distributed only to causes or organizations supporting and furthering the ideals of liberty, that are qualified or would qualify for exemption as organizations described in Section 501(c) (3) of the Internal Revenue Code of 1954, as amended, or a successor statute. Such decision is to be made at the discretion of the Board of Directors.

These amendments to the Articles of Incorporation were unanimously approved at a meeting of the Board of Directors held on August 21, 1989.

Tina Carter
Tina Carter, Treasurer

Date 9/9/89

2204071368 5

(3) Check and complete one of the following applicable statements:

( ) _____ was the date of the meeting of members at which the amendment was adopted. A quorum was present at the meeting and the amendment received at least two-thirds of the votes which members present or represented by proxy were entitled to cast.

( ) The amendment was adopted by a consent in writing by all members entitled to vote thereto.

(X) There are no members, or no members having voting rights. The amendment received a majority vote directors in office at a meeting of the board held on August 21, 1989.

9/21/89 (Date)

Tina Carter Treasurer (Signature and title of officer)

P 2 0 4 0 7 1 3 6 3 8 6

FILING FEE $10.00

FILE IN DUPLICATE

ssf 77-2 (R 11/84)

Attachment C18

Statement of Consent for [redacted]e Registered Agent for th[redacted]nvisible Hand Foundation

I, Tom Tanaka, accept the designated role as Registered Agent for the Invisible Hand Foundation. Furthermore, I accept responsibility for the receiving of Service of Process in the name of the corporation, for forwarding mail to the corporation, and for immediately notifying the office of the Secretary of State in the event of my resignation or of any change in the address of the registered office of the corporation

Tom Tanaka

Tom Tanaka

Date 9-9-89

2240213637

Bylaws of The Invisible Hand Foundation

ARTICLE I. NAME

The name of the corporation is The Invisible Hand Foundation

ARTICLE II. PURPOSE

2.1 State of Purposes

To operate exclusively for religious, charitable, scientific, literary, or educational purposes, within the meaning of Section 501 (c) (3) of the Internal Revenue Code of 1954.

2.2 Non-profit Operation

All income of the corporation after paying the costs of operation and making provision for adequate reserves shall be devoted to the purposes described in Articles 2.1 of the Bylaws and to charitable, educational, and scientific purposes. No part of the net earnings of the corporation shall be distributed to its members, directors, officers or other private persons.

Notwithstanding any other provision of these bylaws, no director, officer, employee or representative of the corporation shall take any action or carry on any activity by or on behalf of the corporation not permitted to be taken or carried on by an organization exempt under Internal Revenue Code Section 501 (c) 3 or which would cause the corporation to be classified as a private foundation under Internal Revenue Code Section 509.

ARTICLE III. MEMBERSHIP

There shall be no members of the corporation

ARTICLE IV. BOARD OF DIRECTORS

4.1 Management of the Corporation

The business, operations and affairs of the corporation shall be controlled by a Board of Directors.

4.2 Number of Directors

The number of directors of the corporation may be no more than fifteen (15). The Board of Directors may also elect ex-officio members of the Board as it deems appropriate. Ex-officio members of the Board shall not have the right and responsibility to vote but shall attend the meetings of the Board. As from time to time designated by the Board of Directors or President, ex-officio Board members may be appointed to committees and attend meetings of committees and, for purposes of these bylaws as they may provide for committee appointments, ex-officio members shall be included in the term "directors". However, a majority of all Board committees shall consist of active members of the Board.

4.3 Qualifications of Directors

Any person may serve as a director of the corporation so long as:

A. Such individual is not an employee of the corporation.

4.4 Term of Office

The term of office for each director shall be two (2) years. Each director shall hold office for the term for which he/she was elected and until his/her successor shall have been elected and qualified. The terms of the Directors shall be staggered such that approximately one-half of the Board shall be elected annually. If necessary to avoid termination under the above rules, the term of the Past President shall be extended so that said person may fulfill the two-year term of office as Past President. A director shall be eligible for reelection to three (3) consecutive terms in office.

4.5 Nomination and Election of Directors

Election of directors shall be made from among those persons nominated for that purpose by the Nominating Committee. The Board of Directors shall by resolution prescribe the composition of the Nominating Committee and the manner in which the preceedings of the committee shall be conducted.

4.6 Removal from Office

Any directors may be removed from office with cause by a vote of at least two-thirds (2/3) of the directors present at any regular meeting of the Board. Cause for removal shall include but not be limited to three consecutive absences of a director from regular or special meetings of the Board.

4.7 Vacancies

The Board of Directors shall have the power to fill any vacancy occurring in the membership of the Board at any time other than the expiration of a term or any directorship to be filled by reason of any increase in the number of directors. The director elected to fill a vacancy shall be elected from the unexpired term of his/her predecessor in office.

4.8 Meetings

4.8.1 Regular Board Meetings

Regular meetings of the Board of Directors shall be held at such times and at such places within the State of Washington as the Board shall determine by adopting a schedule of regular meetings.

4.8.2 Special Board Meetings

Special Board meetings may be called by the President or by a majority of directors. Special Board meetings shall be held within the State of Washington, at such time and place as designated by the person or persons calling the meeting. Any business may be conducted at a special meeting.

4.8.3 Notice

No notice of a regular Board meeting is required. Notice of a special Board meeting shall be given verbally at least 24 hours prior to the time of the meeting. Such notice may be given verbally rather than in written form. Notice, if written, may be delivered personally or by mail and, if mailed, the notice shall be deemed delivered two days after deposit in the United States mail addressed to the director at his/her address as it appears in the records of the corporation, postage prepaid. Neither the business to be transacted at, nor the purpose of, any special meeting of the Board need be specified in the notice.

4.8.4 Quorum and Voting

The presence of a majority of directors shall constitute a quorum for the transaction of business. Each director shall possess one vote as to all matters coming before the Board. Voting by proxy is not authorized. The act of the majority of the directors present shall be the act of the Board of Directors, unless the act of a greater number is required by the Articles of Incorporation, by law or by other provisions of these bylaws.

4.9 No Compensation for Directors

A Director shall not be compensated for serving as a director but may be reimbursed for expenses incurred in carrying out his/her duties as a director. Reimbursement for expenses shall be subject to prior approval of at least three executive officers.

4.10 Executive Board

The executive Board shall represent and act for the Board of Directors between meetings of the Board of Directors on matters of policy and procedure which are of interest to the corporation and shall have all powers and duties as may be, from time to time, delegated to the Executive Board by the Board of Directors. The Executive Board shall consist of The President, the Vice President, The Secretary, The Treasurer and the Past President. Action by the Executive Board shall require the vote of a majority of the members thereof.

ARTICLE V. OFFICERS

5.1 Executive Officers

The executive officers of the corporation shall consist of the President, the Vice President, the Secretary, the Treasurer, and such other officers and assistant officers as may be deemed necessary by the Board of Directors, each of whom (except the Past President). The executive officers shall serve without compensation. The four executive officers identified above shall be members of the Board of Directors.

5.2 Term of Office of Executive Officers

Executive officers shall be elected to a two year term, subject to each officer's continued membership on the Board of Directors. However, the Past President shall serve a term of two years, irrespective of the term or terms of the President.

5.3 Removal

Any executive officer may be removed with cause by a two-thirds (2/3) vote of the Board of Directors present at any regular or special meeting. Cause shall include but not be limited to three consecutive unexcused absences of the executive officer from meetings of the Board of Directors which, for purposes of this Article 5.3, shall be defined to include meetings of the Executive Board.

5.4 Vacancies

Vacancies in any executive office caused by any reason shall be filled by the Board of Directors at any regular or special meeting by selecting a suitable and qualified person to act during the unexpired term.

9204021369-1

5.5 President

The President shall be the principal officer of the corporation, shall preside when present at all meetings of the members and at all meetings of the Board, and, subject to the Boards control, shall supervise and control all of the business and affairs of the corporation. With the Secretary or other officer of the corporation authorized by the Board, shall sign deeds, mortgages, bonds, contracts or other instruments that the Board has authorized to be executed, except when the signing and execution thereof have been expressly delegated by the Board, by these bylaws or by law to some other officer. In general, the President shall perform all duties incident to the office of the President and such other duties as may be prescribed by the Board from time to time.

5.6 Vice President

In the absence or disability of the President, the Vice President (or in the event of more than on Vice President, the Vice President who was elected to serve as Vice President I) shall be vested with all powers and duties of the President. Vice Presidents shall perform such other duties and have such powers and authority as from time to time may be assigned to them by the President or by the Board.

5.7 Secretary

The Secretary shall see that the minutes of the meetings of the Board are kept, see that all notices are duly given in accordance with these bylaws or as required by law, and, in the absence of contrary direction by the Board, shall execute all deeds, mortgages, bonds, contracts, or other instruments that the Board has authorized to be executed. In general, The Secretary shall perform all duties, incident to the office of Secretary and such other duties as from time to time may be assigned to the Secretary by the President or by the Board. In the absence of the Secretary, an assistant Secretary duly elected by the Board may perform the Secretary's duties.

5.8 Treasurer

The Treasurer shall receive and deposit all monies or funds of the corporation in such depositories as may be selected by the Board and shall disburse the funds of the corporation in the manner directed by the Board. In general, the treasurer shall perform all duties incident to the office of treasurer and other such duties as from time to time may be assigned to the Treasurer by the President or by the Board. In the absence of the Treasurer, an assistant Treasurer duly elected by the Board may perform the Treasurers duties.

5.9 Past President

The Past President shall be the immediate past President of the corporation. The Past President shall perform the functions and duties as agreed upon between the President and the Past President.

5.10 Executive Director

In addition to the executive officers listed above, the Board of Directors shall select an Executive Director who shall be responsible for implementing the policy and programs of the corporation, as set forth by the Board of Directors, Executive Board and members. Such Executive Director shall be the chief administrator of the corporation and shall be administratively responsible to the Board of Directors and the Executive Board as set forth in his/her job description as adopted by the Board.

ARTICLE VI. ADMINISTRATIVE AND FINANCIAL PROVISIONS

6.1 Rules of Procedure

The rules of procedure at Board and committee meetings shall be the rules contained in Robert's Rules of Order, as amended, so far as applicable and when not inconsistant with these bylaws, the Articles of Incorporation, or with any resolution of the Board of Directors.

6.2 Signing Financial Documents

All checks, drafts or other orders for the payment of money and other evidences of indebtedness issued in the name of or payable to the corporation, and any and all securities owned or held by the corporation requiring signature for transfer shall be signed or endorsed by such person or persons and in such a manner as from time to time shall be so authorized and directed by the Board of Directors and, in the absence of any other express authorization, shall be signed or endorsed by the Treasurer. Notwithstanding the foregoing, all expeditures shall have been approved by at least three executive officers.

6.3 Authority to Bind the Corporation

The Board of Directors may authorize any person to execute and deliver any contract or other instruments in the name of and on behalf of the corporation, and such authorization may be general or be confined to specific instances.

ARTICLE VII. Fiscal Year

The Fiscal year of the corporation shall be the calendar year from January 1 through December 31.

ARTICLE VIII. ACTIONS WITHOUT MEETINGS; WAIVER OF NOTICE

8.1 Actions without Meeting

Any action of the membership or directors that is required to be taken at a meeting or that may be taken at a meeting may be taken without a meeting if a consent in writing setting forth the action so taken shall be signed by all of those entitled to vote on the matter. In addition, the Board may by resolution elect to vote by telephone poll on any matter discussed at any regular meeting (including any meeting held pursuant to Article 8.2 below).

8.2 Meetings by Communications Equipment

The directors may participate in a meeting by means of a conference telephone or similar communications equipment so long as all persons participating in the meeting hear each other at the same time. Participation by such means shall constitute presence in person at a meeting.

8.3 Waiver of Notice

Whenever any notice is required to be given to any member or director, a waiver thereof in writing signed by the person entitled to such notice, whether signed before or after the time of the meeting or other matter requiring notice, shall be equivalent to the giving of such notice.

8.4 Waiver of Notice by Attendence

Attendence of a director or a member at any meeting shall constitute a waiver of notice of such meeting except where a director or member attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

ARTICLE IX. INDEMNIFICATION OF TRUSTEES

Each director or officer now or hereafter serving on the corporation and the respective heirs, executors and administrators of each of them, shall be indemnified by the corporation against all costs, expenses, judgements and liabilities, including attorneys fees, reasonably incurred by or imposed upon him/her in connection with or resulting from any action, suit or proceeding, civil or criminal, in which he or she is or may be made a party by reason of his or her having been such trustee or officer or by reason of any action alleged to have been taken or admitted by him or her as such trustee except in relation to matters as to which he or she shall be finally adjudged to have been liable for willful misconduct in performance of his or her duties as such trustee, director or officer. The foregoing right of indemnification shall not be exclusive of other rights to which such director, trustee or officer may be entitled as a matter of law or under any bylaw, agreement, vote of the Board of Directors, vote of the members or otherwise.

2040213694

ARTICLE X. AMENDMENTS TO BYLAWS

The Bylaws may be altered, amended, repealed or suspended by a majority vote of the Board of Directors at any meeting at which a quorum is present if such proposed action has been placed on the agenda for such meeting and notice thereof has been given to each member of the Board of Directors at least two weeks on advance.

These bylaws were adopted by the Board of Directors of the corporation on August 21, 1989, at Seattle, Washington.

Authorized signature(s)

Treasurer Ivo Parker

2240913695

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Alan Lindsay
2300 Lazy Hollow #330-D
Houston, TX 77063

RE: MUR 3177

Dear Mr. Lindsay:

This letter acknowledges receipt on November 16, 1990, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ruth Bennett, Karen Allard, Bettina Carter, Richard Shepard, David A. Jones, the Invisible Hand Foundation, successor to LPWS Convention Services Group, Jack Allard, William Bradford, Michael Holmes, Honey Lanham, James Turney, the Libertarian National Committee and Stephen R. Fielder, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

2040913696

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. Jack Allard
6901 Narrows Lane N.
Tacoma, WA 98407

RE: MUR 3177

Dear Mr. Allard:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204021136997

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913698

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Ms. Karen Allard
6901 Narrows Lane N.
Tacoma, WA 98407

RE: MUR 3177

Dear Ms. Allard:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204091369?

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913700

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Ms. Ruth Bennett
c/o The Invisible Hand Foundation
P.O. Box 23114
Seattle, WA 98102

RE: MUR 3177

Dear Ms. Bennett:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204091370 1

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913702

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. William Bradford
c/o Liberty Magazine
P.O. Box 1167
Port Towsend, WA 98368

RE: MUR 3177

Dear Mr. Braford:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204021370 3

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913704

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Ms. Bettina Carter
1205 Olive Street E. #A
Seattle, WA 98122

RE: MUR 3177

Dear Ms. Carter:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204091370 5

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

29040913706

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. Stephen R. Fielder, Treasurer
Libertarian National Committee
1528 Pennsylvania Avenue, S.E.
Washington, D.C. 20003

RE: MUR 3177

Dear Mr. Fielder:

The Federal Election Commission received a complaint which alleges that the Libertarian National Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2040213707

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

72040921370 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. Michael Holmes
21715 Park Brook Drive
Katy, TX 77450

RE: MUR 3177

Dear Mr. Holmes:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2040913709

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

20040713710

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David A. Jones
18022 SE 128th
Renton, WA 98056

RE: MUR 3177

Dear Mr. Jones:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2040713711

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913712

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Ms. Honey Lanham
4327 Sexton
Dallas, TX 75229

RE: MUR 3177

Dear Ms. Lanham:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204021371 3

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040713714

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. Richard Shepard
1107 1/2 Tacoma Avenue South
Tacoma, WA 98402

RE: MUR 3177

Dear Mr. Shepard:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204013715

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

24044137116

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. Tom Tanaka
The Invisible Hand Foundation,
Successor to LPWS Convention Services Group
1205 Olive Street E., Apt. A
Seattle, WA 98122

RE: MUR 3177

Dear Mr. Tanaka:

The Federal Election Commission received a complaint which alleges that The Invisible Hand Foundation , successor to LPWS Convention Services Group ("The Foundation") may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against The Foundation, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204021371 7

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

22040913713

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1990

Mr. James Turney
2214 Hay Road
Richmond, VA 23224

RE: MUR 3177

Dear Mr. Turney:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2240291379

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

20040213720

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 DEC -6 PM 12:43

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 23, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC -6 PM 4:30

POSTMASTER
Renton, WA 98058

RE: MUR 3177

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of David A. Jones. According to our records, the last known address of David A. Jones was 18022 S.E. 128th, Renton, WA 98056. 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 Jeff Long, the staff member assigned to this matter, at (202) 376-5690.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble
General Counsel

Mary L. Taksar

BY: Mary L. Taksar
Staff Attorney

Enclosure
Envelope

RENTON, WA HIGHLANDS STA
DEC 8 1990
USPO

David Jones Does not receive mail at 18022 SE 128th and I don't have a forward address for him.

D. Flynn 12/3/90

9204091372 1

OGC 8914

The Libertarian Party

5 December 1990

Mr. Jeff Long
Federal Election Commission
Washington, DC 20463

Re: MUR 3177

Dear Mr. Long:

With reference to the letter dated 21 November 1990 from the Federal Election Commission to me, in my capacity as Treasurer, Libertarian National Committee, and in conformance with our telephone conversation of this day, this constitutes a written request for an extension of twenty days within which to respond to the complaint of Mr. Alan Lindsay.

Yours truly,

Stephen R. Fielder, Treasurer
Libertarian National Committee

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 10 PM 4:52

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON
90 DEC 10 AM 10:52

2040913722

DOC. 8979

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL UNIT

90 DEC 14 PM 12:26

December 8, 1990

21715 Park Brook Drive
Katy, TX 77450
(713) 492-6608

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 DEC 14 PM 3:27

Mr. Jeff Long
Federal Election Commission
Washington, DC 20463

RE: MUR 3177

Dear Mr. Long,

This is in response to your letter of November 21, 1990 regarding the 1987 Libertarian Party national presidential nominating convention which nominated Ron Paul as the 1988 presidential candidate.

I note in the letter by Lois Lerner on behalf of Lawrence M. Noble, General Counsel, that the enclosed complaint made by Mr. Alan Lindsay "alleges that you may have violated the Federal Election Campaign Act of 1971".

First, I would like you to note that Mr. Lindsay's letter specifically does not list me as a respondent in this matter; rather, he includes my name as someone who may be able to furnish additional information about this matter.

While I realize that you may have utilized a form letter, I would first request that you remove me as a respondent in this matter because I have not yet been so named by any complainant.

Secondly, it is correct that I can provide some additional information due to the fact that during the spring and summer of 1987 I did act in the following capacity with respect to the LP presidential nominating convention:

I, along with Mr. Matthew T. Monroe and Ms. Honey Lanham volunteered to serve on a convention oversight committee charged with the responsibility of negotiating a contract with the Convention Services Group - LP of Washington State (CSG-LPWS).

During the spring and early summer of 1987 our committee, acting on behalf of the LP National Committee, prepared and revised several drafts of the convention contract with CSG-LPWS, which were ultimately returned with revisions by that group's president, Ms. Ruth Bennett.

2204091372 3

It soon became apparent to us that CSG-LPWS did not view this matter with the same urgency as we did, although they did continue to proceed with advertising and organization of the convention arrangements, speakers, facilities and related matters.

By mid-July it became apparent that our Committee would not be able to resolve differences with CSG-LPWS and we ultimately had to refer the matter back to the LP national committee, which would be meeting immediately prior to the convention in Seattle. My understanding is that LP national chair Jim Turney attempted to resolve differences prior and during this pre-convention session but that ultimately, no signed contract with CSG-LPWS was ever obtained.

Unfortunately, I have long since thrown away my files containing these various draft contracts (which were never signed).

I also attended this presidential nominating convention as both a delegate and as an exhibitor for a product I was marketing. All my payments were made directly to the CSG-LPWS, which I believe was the practice for all such payments. This group also received all funds earned by the convention except for the proceeds of one specific fundraising banquet event, proceeds of which were kept by the national Libertarian Party.

I am also certain that the national Libertarian Party (of which I was neither an officer nor national committee member) did indeed file on a timely basis all reports required during the relevant periods of this matter with your Commission.

As you can see by the above narrative, I believe my actions and responsibilities in this matter would not subject me to the jurisdiction of the Committee for any action relating to the conduct of the 1987 LP presidential nominating convention.

My reply has been prepared as timely as was possible. Your package and letter arrived last week while I was out of town and I have been unable to respond until today.

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I trust the above has been sufficient to clarify my role in this matter. Please advise if additional information is necessary. My phone number is listed below my address above. I will be out of town from 12/13 thru year end, however.

Sincerely yours,

Michael E. Holmes

22040913725

SAILER & CO., P.S.
General Business & International Law
16770 N.E. 79th St., Suite 208
Redmond, WA 98052
Tel: (206) 867-0812
Fax: (206) 883-4616

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
90 DEC 24 AM 9:03

December 17, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Attn.: Jeff Long, Esq.

Re: Complaint No. MUR 3177

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 26 PM 12:23

Dear Mr. Noble:

Before the attached Reply Letter in the above referenced matter is reviewed by counsel in your office, we request that you and/or the Commission rule on the legality of even allowing this complaint procedure, No. MUR 3177, on grounds that the Period of Limitations (2 U.S.C. 455) appears to have run in the matter at issue.

The National Libertarian Party Nominating Convention officially ended on September 6, 1987. Sixty days thereafter, or November 6, 1987, any appropriate and required reports necessary under the Federal Election Campaign Laws should have been filed with the Federal Election Commission.

The date of the Complaint Letter in this matter is November 12, 1990, more than 6 days beyond the three year period of limitation allowed by the Federal Election Campaign Law. Since the Complaint was not instituted within the three years allowed by law, whatever its merits may or may not be, it should be dismissed. We therefore ask that the Complaint be dismissed with prejudice, and that any further action concerning the issues raised in the Complaint be barred from further complaint investigation under the Federal Election Campaign Law.

Sincerely yours,

Robert O. Sailer

Robert O. Sailer

ROS:sm
attachment

2204091137226

SAILER & CO., P.S.
General Business & International Law

16770 N.E. 79th St., Suite 206
Redmond, WA 98052

Tel: (206) 867-6612
Fax: (206) 883-4616

December 17, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Attn.: Jeff Long, Esq.

Re: Complaint No. MUR 3177

Dear Mr. Noble:

Your letter in the above referenced matter was directed to Ruth Bennett, Karen Allard, Bettina Carter, Richard Shepard, David Jones and the LPWS Convention Services Group ("CSG"). Each of the named respondents is or was an officer, director or agent of the Invisible Hand Foundation (f/k/a LPWS Convention Services Group), a non-profit Washington corporation which I represent as corporate counsel.

The Invisible Hand Foundation (hereafter "IHF") request that I reply to your letter on behalf of the corporation and its former and current officers, directors and registered agent. A signed Statement of Designation of Counsel is enclosed as you requested.

ISSUE: Based upon our review of the allegations contained in the letter of Mr. Alan Lindsay dated November 12, 1990, corporate records for the period in question, and applicable law (2 U.S.C. 437; 11 C.F.R. 107.1, 11 C.F.R. 9008.1 (b) and 11 C.F.R. 9008.12(b)), we believe that the IHF is not in violation of the Federal Election Campaign Act of 1971 (the "Act"), as amended.

It should be noted that Mr. Lindsay is no longer an employee of the National LP office nor a member-in-good-standing of the Libertarian Party for substantive reasons which he might best answer as part of this investigation.

FACTS: The IHF is currently registered in the State of Washington and with the Federal Internal Revenue Service as a qualified, non-profit corporation holding the status of a 501 (c) (3) entity for tax purposes.

The corporation was incorporated on December 23, 1986 by Ruth Bennett, David Jones and Bettina Carter. The corporation is not now nor has it ever been or acted as a committee or affiliate of any national, state or local

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politicial party, candidate or entity, nor has it served or acted as the organizing or host committee for any other group of persons representing a State municipality, local government agency or political subdivision, chamber of commerce, or visitors and convention agency. At all times it has performed services, provided products, and conducted itself as an independent contractor for hire with full risk and liability of loss or profit. The officers have been solely responsible to the Board of Directors for all policy and operational decisions, and to the State of Washington and Internal Revenue Service for proper conduct as a non-profit entity.

Copies of the incorporation documents of the corporation were submitted to you with the complaint letter, hence we have chosen not to duplicate them for attachment to this letter from the respondents. A copy of the non-profit 501(c)(3) determination from the Internal Revenue Service is attached as Exhibit "A".

EVENTS: The following is the actual chronology of events:

- In August 1985 the National LP selected Seattle for the site of the 1987 National Nominating Convention. The National LP entered into negotiations on a proposal from H. Barron Enterprises in Seattle to provide under contract services to produce a national convention for the National LP as an independent contractor. Upon selection of Seattle as a site, Ruth Bennett resigned her post as a member of the standing Convention oversight committee to avoid any appearance of a conflict of interest. No committee was appointed by the National LP Chair until April 1987 when Mike Holmes, Matt Monroe and Henry Lanham were appointed.

- H. Barron Enterprises was unable to perform the proposal; negotiations with the proposed contractor were terminated in October 1986

- Contract was awarded to a group in Seattle-Tacoma which commenced pre-incorporation organization steps in October 1986. Corporation registration papers were filed and a Certificate of incorporation issued on December 23, 1986.

- Contract Terms included: CSG to supply all physical arrangements, food, vendor space, speakers, literature, program format and support services for the Convention. CSG to coordinate with National LP regarding photocopying services, media contact, times and meeting

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space for convention business to insure that vendor activities and major convention business did not conflict with the nominating business of the convention. All political policy decisions regarding political speakers, literature, and program format were subject to review by the national LP. CSG accepted full liability for all losses under the verbal contract, and was granted the rights to any profits resulting from the provisions of services. No start up, operating or other funds were provided by National LP to the CSG.

- All convention services have been obtained by the National LP under contract with independent contractors since the first convention held in 1971. The pattern of practice by the The National LP and its policy has been to create an Oversight Committee to enter into either a written or verbal contract with an independent contractor to provide such services. The 1987 Convention was no exception.

- The National Oversight Committee in 1987 was chaired by Michael Holmes. Mr. Holmes reported to the Chair of the National LP, Mr. Jim Turney. No written contract was completed, however the Oversight Committee functioned to police the efforts of the CSG prior to and throughtout the Convention proceedings.

- 1987 - Successful Convention - completion of contract.

- August 1989 - Jack and Karen elected as officers of IHF.

- September 25, 1989 - CSG formally changed its name to The Invisible Hand Foundation by filing Articles of Amendement with the State of Washington.

- Please refer to Summary of Events by Karen Allard (elected president of IHF on November 24, 1990) dated 31 May 1990, attached as Exhibit "B".

FUNDING SORCES: All funds to finance the operations of IHF (f/k/a CSG) were generated by IHF profit making functions within the guidelines of the Internal Revenue procedures. Specifically, monies were raised for its operations in 1987 by selling LibertyBucks or coupons in return for seminars, cruises and entertainment functions, and services available to attendees at the 1987 Convention. Please note that all attendees to the

Convention were admitted to the Convention itself by the National LP without charge. In addition, the corporation raised funds by selling advertising space and booth space at the hotel (hotel provided space without charge to IHF in return for hotel room and meal bookings).

The IHF was successful with its Convention contract to raise monies needed to operate the corporation. No funds, political contributions or campaign donations were received or used by the IHF for the Convention.

ALLEGED VIOLATION: The letter of complaint alleges a reporting requirement for the IHF, citing a regulation which requires reporting requirements for "committees", "...including a host committee or other organization or group of persons which represents a State municipality, local government agency or other political subdivision in dealing with officials of a national political party with respect to matters involving a presidential nominating convention" (11 C.F.R. 107.1). Since the IHF is clearly outside the scope of this "committee" definition, we respectfully submit that the complaint letter is without legal or substantive merit and that no duty to register and report in accordance with 11 C.F.R. 9008.12(a) attached to IHF.

REQUEST: We therefore request that the Commission, pursuant to its duties under 2 U.S.C. 437 (g), find on the facts that the IHF has not committed nor is about to commit a violation of the Act.

If you have any further questions, please contact me and I will make every effort to assist you in finding the appropriate information to resolve this matter.

Sincerely yours,

Robert O. Sailer

ROS:sm
enclosures: 2
cc: Ruth Bennett
Karen Allard
Jack Allard
Bettina Carter
Richard Shepard
David Jones
The Invisible Hand Foundation, f/k/a
LPWS Convention Services Group

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EXHIBIT "A"

Internal Revenue Service
District Director

Department of the Treasury

COPY

P O BOX 2350 ROOM 5127 ATTN: E.O.
LOS ANGELES, CA 900532350

Date: AUG. 31, 1990

INVISIBLE HAND FOUNDATION
1205 OLIVE STREET EAST A
SEATTLE, WA 98122

Employer Identification Number:
94-3112415
Case Number:
950193000
Contact Person:
MAHLATDARNA, CHITRA
Contact Telephone Number:
(213) 725-6619

Accounting Period Ending:
December 31
Foundation Status Classification:
509(a)(2)
Advance Ruling Period Begins:
Oct. 05, 1989
Advance Ruling Period Ends:
June 30, 1994
Addendum Applies:
Yes

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3).

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably be expected to be a publicly supported organization described in section 509(a)(2).

Accordingly, you will be treated as a publicly supported organization, and not as a private foundation, during an advance ruling period. This advance ruling period begins and ends on the dates shown above.

Within 90 days after the end of your advance ruling period, you must submit to us information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, you will be classified as a section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, you will be classified as a private foundation for future periods. Also, if you are classified as a private foundation, you will be treated as a private foundation from the date of your inception for purposes of sections 507(d) and 4940.

Grantors and contributors may rely on the determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, grantors and contributors may continue to rely on the advance determination until the Service

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makes a final determination of your foundation status.

If notice that you will no longer be treated as a publicly supported organization is published in the Internal Revenue Bulletin, grantors and contributors may not rely on this determination after the date of such publication. In addition, if you lose your status as a publicly supported organization and a grantor or contributor was responsible for, or was aware of, the act or failure to act, that resulted in your loss of such status, that person may not rely on this determination from the date of the act or failure to act. Also, if a grantor or contributor learned that the Service had given notice that you would be removed from classification as a publicly supported organization, then that person may not rely on this determination as of the date such knowledge was acquired.

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of $100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the private foundation excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other Federal excise taxes. If you have any questions about excise, employment, or other Federal taxes, please let us know.

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances. See Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, which sets forth guidelines regarding the deductibility, as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

You are required to file Form 990, Return of Organization Exempt From Income Tax, only if your gross receipts each year are normally more than $25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not

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required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally $25,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of $10 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed $5,000 or 5 percent of your gross receipts for the year, whichever is less. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

If we have indicated in the heading of this letter that an addendum applies, the addendum enclosed is an integral part of this letter.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

Michael J. Quinn
District Director

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INVISIBLE HAND FOUNDATION

Due to the notification requirements of section 508(a) of the Code, the effective date of this letter is Oct. 05, 1989, the date upon which we received your application. Contributions to you are deductible only if made on or after that date. You have previously agreed to that effective date.

FOUNDATION STATUS:

170(b)(1)(A)(vi) and 509(a)(1)

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Form **872-C**
(Rev. March 1986)

Department of the Treasury—Internal Revenue Service

Consent Fixing Period of Limitation Upon Assessment of Tax Under Section 4940 of the Internal Revenue Code

(See Form 1023 instructions for Part IV, line 3.)

OMB No. 1545-0056
Expires 3-31-89

To be used with Form 1023. Submit in duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

The Invisible Hand Foundation
(Exact legal name of organization)

1205 Olive Street East, Apt A, Seattle, WA 98122
(Number, street, city or town, state, and ZIP code)

} and the District Director of Internal Revenue

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, then the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year December 31, 1989

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Name of organization	Date

Officer or trustee having authority to sign

Signature ▶ Tina Carter

District Director Michael J. Dennis — Date AUG 3 1990

By ▶ Acting Manager

For Paperwork Reduction Act Notice, see page 1 of the Form 1023 instructions.

EXHIBIT "B"

CONVENTION SERVICES GROUP/INVISIBLE HAND FOUNDATION TIMELINE

August of 1985, the 1987 National LP Presidential Nominating Convention was awarded to H. Barron Enterprises and the LPWS as a profit making venture. Seattle was the LP National Committee's second choice for the 1987 convention as the organizers of the chosen site, Reno, were unable to do it.

October of 1986, the LPWS officially recognized LP Convention Services as the official entity for producing the 1987 National LP Presidential Nominating Convention. H. Barron Enterprises was deemed incapable of handling the convention by the LPWS Executive Committee. The LP Convention Services would take full responsibility and liability for the 1987 convention. No verbal or written contract was ever discussed, prepared, or signed between the LP Convention Services and the LPWS. The first employee of LP Convention Services was hired, Richard Shepard. His job title was convention director.

December of 1986, the LP Convention Services convention director filed the articles of incorporation under the non-profit laws of the State of Washington, R.C.W. 24.03. The name of the non-profit corporation was to be the Convention Services; named by the officers of the corporation. When the articles were filed with the State of Washington, there already was a Convention Services. The convention director of the LP Convention Services renamed the corporation, LPWS (just the initials) Convention Services Group or LPWS CSG without prior approval of the officers. Officers of the LPWS Convention Services Group were Ruth Bennett, Tina Carter, and David Jones; long time Libertarians. The use of the shortened name CSG was done for convenience.

April of 1987, the LP National Committee appointed a convention oversight committee chair, Honey Lanham. This committee had not been functioning since August of 1985 as the chair, Ruth Bennett resigned at that meeting. The reactivation of this committee enabled the LPWS Convention Services Group to begin formal negotiations with the national LP regarding a contract. The convention oversight committee was charged with the preparation and negotiation of a contract with the LPWS CSG. At this meeting, the LP National Committee passed resolution 326 that would hinder convention organizers from contracting with speakers or exhibitors the LP National Committee did not approve. By this time, much of the 1987 convention program, speakers, and exhibitors were confirmed and contracts had been signed.

September of 1987, the Seattle National LP Presidential Nominating Convention was a success. Tonie Nathan, employed as media coordinator for the LPWS CSG, was successful in getting media attention for the National LP and the 1987 convention. The LPWS CSG's convention director was fired on September 2, 1987 by the LPWS CSG for failure to perform his assigned duties. The main volunteers

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(unpaid) for the convention included. Ruth Bennett, Tina Carter, David Jones, Tom Tanaka, Howard Cherry, and Karen Allard. There were several LPWS members, National LP members, and non-libertarian friends who assisted with on-sight logistics such as introducing speakers, working at the LPWS booth, monitoring the speaking events, participating in the talent show, babysitting, working in the office, and other tasks. No contract was ever signed between the LPWS CSG and the National LP.

October of 1987, LPWS CSG issued a bill to the National LP for photocopying National LP documents and expenses accrued by the media director, Tonie Nathan.

January of 1988, a settlement proposal given by the LP National Committee was accepted by the LPWS CSG. The sum of $2,901.78 would be paid to the LPWS CSG in installments. It took until March of 1989 for the National LP to complete payments to the LPWS CSG and then, final payment was made to Tonie Nathan by the LPWS CSG.

March of 1989, Ruth Bennett and Tina Carter were the remaining officers of the LPWS CSG. David Jones moved to Oregon and was not active in the LPWS CSG. At the March meeting, the articles of incorporation and the bylaws were reviewed. It was discussed whether the LPWS CSG should dissolve at this time or continue as a corporation. The governing documents clearly stated this was a legal possibility. There was also discussion about a more suitable name and the benefits of a 501(c)(3) foundation. It was agreed that the profits from the convention would be used more appropriately and effectively if they were left with LPWS CSG. It was also agreed the profits would be used to further the cause of liberty in Washington through educational avenues. The LPWS CSG officers believed a foundation would be complimentary to the work done by the political organization, the LPWS. The LPWS CSG had invited Karen Allard and Jack Allard to attend the March meeting and give their input as private citizens. No formal announcement or news release was issued regarding the decisions made at the meeting. An announcement was planned at a later time when more research into the foundation status and consultation with the accountant and lawyer were complete.

August of 1989, Richard Shepard, fired employee of the LPWS CSG began writing letters to the officers of the LPWS CSG and the LPWS protesting the decision made by the LPWS CSG and demanding information. The name Invisible Hand Foundation was chosen to replace the name LPWS CSG purely for public appeal. The accountant was assisting with the paperwork to file for a 501(c)(3) foundation. New board members were elected: Ruth Bennett, president; Karen Allard, vice-president; Tina Carter, treasurer; and Jack Allard, secretary.

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September of 1989, Richard Shepard continued with his letters and demands. Michael Dunn, a long time Libertarian, was asked to review documents and interview 9 individuals regarding the LPWS CSG/IHF and the LPWS relationship. The LPWS Chair, Marla Bottemiller set the rules and stated these in a letter sent to Michael Dunn. The IHF officers also set their parameters and corresponded by letter with the chair of the LPWS, Marla Bottemiller.

March of 1990, a 129 page report was issued by Michael Dunn, discussing the relationship. Michael Dunn issued opinions, a summary, conclusions; based on heresay and inference. Michael Dunn went beyond the scope, direction, and intent of the investigation; did not talk with all the people he was directed to interview so he wasn't able to understand the history, and made false accusations against former and current LPWS members and current IHF officers.

April of 1990, the Invisible Hand Foundation prepared and presented a proposal to the LPWS Executive Committee repudiating the report and charges rendered, announced the opening of 5 new board positions on the IHF to be announced at the May board meeting, and agreed to assist the LPWS with incorporation. The LPWS SEC and the board members of the IHF met to discuss the report commissioned by the LPWS SEC and submitted by Michael Dunn. Verbal and written testimony was presented to repudiate the charges and to give a clear and accurate account of the history behind the 1987 convention and LPWS CSG. Proposal given by the IHF to the LPWS SEC was approved 8 to 2 and signed by 2 officers of the LPWS SEC and 2 board members of the IHF.

May of 1990, board meeting of the Invisible Hand Foundation. Packets describing the IHF purpose, projects, and board members were handed out. The next Invisible Hand Foundation board meeting will be held in August of 1990.

- Kar[illegible]
21 May 1990

92040913738

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3177

NAME OF COUNSEL: Robert O. Sailer, Esq.

ADDRESS: Sailer & Co., P.S.
16770 N.E. 79th St., Suite 205
Redmond, WA 98052

TELEPHONE: Tel. (206) 867-0512 Fax: (206) 883-4616

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.

Dec 16, 1990
Date

Karen A Allard
Signature

RESPONDENT'S NAME: Karen A Allard

ADDRESS: President - Invisible Hand Foundation
PO Box 23114
Seattle Wa 98102

HOME PHONE: 206 725 1838

BUSINESS PHONE: _____

2204091337739

From SAILER & CO., P.S. 867-0512

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3177

NAME OF COUNSEL: Robert O. Sailer, Esq.

ADDRESS: Sailer & Co., P.S.
16770 N.E. 79th St., Suite 205
Redmond, WA 98052

TELEPHONE: Tel.(206) 867-0512 Fax: (206) 883-4616

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.

12/16/90
Date

Karen A Allard
Jack L. Allard
Signature

RESPONDENT'S NAME: Karen A Allard & JACK L ALLARD

ADDRESS: 6901 NARROWS LN N
TACOMA, WA 98407

HOME PHONE: (206) 759-1835

BUSINESS PHONE:

9204091337740

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3177

NAME OF COUNSEL: Robert O. Sailer, Esq.

ADDRESS: Sailer & Co., P.S.
16770 N.E. 79th St., Suite 205
Redmond, WA 98052

TELEPHONE: Tel.(206) 867-0512 Fax: (206) 883-4616

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.

16 DEC 90
Date

Ruth E. Bennett
Signature

RESPONDENT'S NAME: Ruth E. Bennett

ADDRESS: 1600 43rd East # 202
Seattle, WA 98112

HOME PHONE: 206/328-3539

BUSINESS PHONE: 206/281-9898

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OF COU

, Esq.

S.

MUR

NAME OF CO

3177 d, WA 98052

ADDRESS: Tel. (206) 867-0512 Fax: (206) 883-4616

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.

12/18/90
Date

Signature

RESPONDENT'S NAME: DAVID JONES

ADDRESS: 22140 NW REEDER RD

PORTLAND OR 97231

HOME PHONE: 503) 621-3732

BUSINESS PHONE:

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3177

NAME OF COUNSEL: Robert O. Sailer, Esq.

ADDRESS: Sailer & Co., P.S.
16770 N.E. 79th St., Suite 205
Redmond, WA 98052

TELEPHONE: Tel. (206) 867-0512 Fax: (206) 883-4616

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.

12/18/90
Date

David Jones
Signature

9204091374

RESPONDENT'S NAME: DAVID JONES

ADDRESS: 22140 NW REEDER RD
PORTLAND OR 97231

HOME PHONE: 503) 621-3834

BUSINESS PHONE:

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3177

NAME OF COUNSEL: Robert O. Sailer

ADDRESS: Sailer & Co.
16770 NE 79th St Suite 205
Redmond WA 98052

TELEPHONE: (206) 867-0512

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.

12/16/90
Date

Bettina R Carter
Signature

RESPONDENT'S NAME: Bettina (Tina) Carter

ADDRESS: 1205 Olive St E #A
Seattle WA 98122

HOME PHONE: (206) 328-6509

BUSINESS PHONE: (206) 622-8845 x 1481 x742

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1991

Stephen R. Fielder, Treasurer
Libertarian National Party
1528 Pennsylvania Avenue, SE
Washington, D.C. 20003

RE: MUR 3177
Libertarian National
Committee and Stephen
Fielder, as treasurer

Dear Mr. Fielder:

This is in response to your letter dated December 5, 1990, which we received on December 10, 1990, requesting an extension of 20 days to respond to the complaint filed by Mr. Alan Lindsay. 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 January 9, 1991.

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

2204091337744

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Bradford
c/o Liberty Magazine
P.O. Box 1167
Port Towsend, WA 98368

RE: MUR 3177

Dear Mr. Bradford:

The Federal Election Commission received a complaint that alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 21, 1990, the Commission mailed copies of the complaint to your address at P.O. Box 1167, Port Towsend, WA 98368. You have not responded to the complaint; therefore, another copy is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9204091374 5

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2204091337465

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Honey Lanham
4327 Sexton
Dallas, TX 75229

RE: MUR 3177

Dear Ms. Lanham:

The Federal Election Commission received a complaint that alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 21, 1990, the Commission mailed copies of the complaint to your address at 4327 Sexton, Dallas, TX 75229. You have not responded to the complaint; therefore, another copy is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9204091374 7

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2204091137488

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard Shepard
1107 1/2 Tacoma Avenue South
Tacoma, WA 98402

RE: MUR 3177

Dear Mr. Shepard:

The Federal Election Commission received a complaint that alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 21, 1990, the Commission mailed copies of the complaint to your address at 1107 1/2 Tacoma Avenue South, Tacoma, WA 98402. You have not responded to the complaint; therefore, another copy is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9204091137749

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

92040913750

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Tanaka
The Invisible Hand Foundation
Successor to LPWS Convention Services Group
1205 Olive Street E., Apt. A
Seattle, WA 98122

RE: MUR 3177

Dear Mr. Tanaka:

The Federal Election Commission received a complaint that alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 21, 1990, the Commission mailed copies of the complaint to your address at 1205 Olive Street E., Apt. A., Seattle WA 98122. You have not responded to the complaint; therefore, another copy is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204091375 1

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9204091375 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Turney
2214 Hay Road
Richmond, VA 23224

RE: MUR 3177

Dear Mr. Turney:

The Federal Election Commission received a complaint that alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). On November 21, 1990, the Commission mailed copies of the complaint to your address at 2214 Hay Road, Richmond, VA 23224. You have not responded to the complaint; therefore, another copy is enclosed. We have numbered this matter MUR 3177. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2204091375 3

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

2204091375 4

MUR 3177

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

January 22, 1991

91 JAN 28 PM 12:25

George F. Rishel
Federal Election Commission
re: MUR 3177
Washington, D.C. 20463

Dear Mr Rishel:

I have received your letter of January 11, but probably mailed at a much later date, since it only arrived here today, and first class mail typically takes only 2-4 days to get from Washington,DC, to Washington (the state).

91 JAN 28 PM 4:02
RECEIVED
FEDERAL ELECTION COMMISSION

The letter contains what I believe may be misstatement of fact: "You have not responded to the complaint; therefore, another copy is enclosed."

I am confused: I wrote to Lois G. Lerner in response to her letter on Dec 4. By your statement that I "have not responded" do you mean that you received my letter, but do not consider it to be a response? Or do you mean that you haven't received my letter?

Since I was not sure what violations of "The Act" I was accused of, mostly my response asked for more specific information, although it did include a brief summary of my own involvement in the events from which, as I fathom it, the charges arose.

So I am not certain whether you are saying that my letter of Dec 4 was not in fact a response, or whether you haven't received my letter or have somehow misplaced or misfiled it. Or perhaps my letter is in the possession of Ms Lerner (the reason that I addressed it to her rather than you was that she wrote the Nov 21 letter to me). Or perhaps it may be somewhere else in your bureau--perhaps you have found it during the 11 days that have passed since you wrote your letter of January 11 to me.

To expedite matters, I enclose a copy of that response.

Please acknowledge your receipt of this letter and a copy of my letter of December 4. In addition, I would appreciate a reasonably prompt reply to my letter of Dec 4.

In addition, could you advise me whether you will be compensating me for the out-of-pocket cost of providing you this information? Since, as nearly as I can figure, my involvement with the accused parties is peripheral at most and not substantially different from hundreds of other people (who presumably are not targets of your investigation, and since I do not see anywhere in the original complaint any suggestion that I am accused of anything, this seems like a reasonable request on my part.

I shall be on vacation (and therefore away from home) from January 24

December 4, 1990

Lois G. Lerner
Federal Election Commission
re: MUR 3177
Washington, D.C. 20463

Dear Ms Lerner:

I have received your letter of November 21 advising me that you have received a complaint that I may have violated "The Act." Unfortunately, neither your letter nor (so far as I can fathom) the complaint itself specifies what actions of mine may have violated "The Act," or what portion of "The Act" I am accused of violating. This leaves me with a problem: how do I defend myself against charges which I am not advised of?

If you could advise me that information I shall be happy to answer.

I am happy, however, to advise you of my involvement with the subject of your letter. I was not involved with Convention Services Group ("CSG"), the organization against whom the complaint was filed, except as an attendee at the convention that it managed and as an exhibitor in the exhibit room of the convention. Is it one of these acts which is alleged to violate "The Act"?

Beginning in the summer of this year, I have been involved with the Invisible Hand Foundation ("IHF"), which I understand to be in some sense a successor to the Convention Services Group. However, as I understand the complaint, it is about activities of "CSG" in its management of the 1987 Libertarian Party Convention ("The Convention") during 1987, and therefore any action that I took in the current year is not the subject of the complaint.

Please advise the specific charges against me as soon as possible.

Thank you.

Sincerely,

R. W. Bradford

2240913756

SAILER & CO., P.S.
General Business & International Counsel

16770 N.E. 79th St., Suite 205
Redmond, WA 98052

Tel: (206) 867-0812
Fax: (206) 883-4616

FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -4 AM 11:12

OGC 9997

January 31, 1991

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Attn.: George F. Rishel, Asst. General Counsel

Re: Complaint No. MUR 3177

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 FEB -4 PM 3:52

2204091375 7

Dear Mr. Noble:

Your letter of January 11, 1991 to Mr. Tom Tanaka, The Invisible Hand Foundation, was referred to our office for reply.

On December 17, 1990, we filed a Request for Dismissal with your office, and in the alternative, a substantive reply, on behalf of all the Respondents identified in your original letter of November 12, 1990. Copies of our reply are attached.

All Respondents were either properly elected or designated directors, officers or agents of The Invisible Hand Foundation. We have been asked to represent the Foundation, its directors, officers and agents in this matter. Such representation includes Mr. Tom Tanaka. Each Respondent is free to file supplemental information or requests of their own directly with your office.

Since we have not had a reply to our letter of December 17, 1990, we wish to request your determination on our Request for Dismissal "with prejudice" for reasons stated in that letter. Thank you for your early consideration of this request.

Sincerely yours,

Robert O. Sailer

ROS:sm
attachment
cc: Jeff Long, Esq. - w/attach.
All Respondents - w/o attach.

STATEMENT OF DESIGNATION OF COUNSEL

COPY

MUR 3177

NAME OF COUNSEL: Robert Sailer

ADDRESS: 16770 NE 79th St, #205
Redmond WA 98052

TELEPHONE: 206-867-0512

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.

12-16-90
Date

Tom Tanata
Signature

RESPONDENT'S NAME: Tom Tanata

ADDRESS: 1205 E. Olive "A"
Seattle WA 98122

HOME PHONE: 206-328-6509

BUSINESS PHONE: _____

9204091375 8

OGC 0016

Richard Shepard
Attorney at Law
3701 South 12th Street
Tacoma, Washington 98405
(206) 752-1189

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -5 AM 11:22

January 30, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 FEB -5 PM 3:10

Mr. Lawrence Noble
General Counsel
c/o Federal Elections Commission
Washington, D.C. 20463

Attn: Mr. George Rishel

Re: MUR 3177; Complaint of Alan Lindsay

Dear Mr. Rishel:

The 1987 National Libertarian Party Convention was ended on or about September 6, 1987. Mr. Lindsay's complaint was made on or about November 12, 1990, more than three years later. I observe that the statute of limitations has, under 2 USC 455, apparently run on Mr. Lindsay's complaint.

If, after reviewing the matter, you conclude otherwise, I shall be pleased to provide you with a more thorough response to Mr. Lindsay's concerns. Please contact me at your convenience.

If you would be so kind, I should also like to know whether, under FEC regulations, I would be able to recover costs and attorney fees from Mr. Lindsay, should his complaint against me prove to be malicious, frivolous, or otherwise improperly made.

Trusting that the foregoing meets with your approval, I remain

Very Truly Yours,

RICHARD SHEPARD

cc: Mr. Robert Sailor, Counsel for the Invisible Hand Foundation

2040913759

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 7, 1991

R. W. Bradford
c/o Liberty Magazine
P.O. Box 1167
Port Townsend, WA 98368

RE: MUR 3177

Dear Mr. Bradford:

This letter is in response to your letter dated January 22, 1991, which was received on January 28, 1991. Attached to your January 22 letter was another letter dated December 4, 1990, which you stated was sent in response to the notification of the complaint filed in MUR 3177.

We have searched our records and files and were unable to locate a copy of the December 4, 1990, letter or any record of its receipt. If we had received the December 4 letter, we would not have sent you the reminder letter since you would have been viewed as having responded to the complaint.

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires us to notify all persons alleged in a complaint to have committed a violation of the Act and to give such persons an opportunity to respond. The Commission has given a broad interpretation to this mandate in order to provide the widest possible notification and opportunity to respond. In the instance of MUR 3177, the complaint alleged in part that the Convention Services Group had raised and spent funds for the Libertarian Party's presidential nominating convention but that no political committee had been registered with the Commission to report such receipts and disbursements. The Invisible Hand Foundation was identified as the successor to the Convention Services Group. You were identified as someone who could provide information regarding these activities and as a director of the Invisible Hand Foundation. Thus, you were considered to fall within the group who were entitled to receive notification of the complaint and to be given an opportunity to respond, which you have done. Notifying you of the complaint, however, should not be construed as representing any decision or judgment by the Commission or the Office of the General Counsel that there is reason to believe you have violated the Act. That assessment can only be made after all responses to the complaint are received.

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If you have any further questions, please direct them to Mary Taksar, the attorney assigned to this matter, at (202) 376-5690.

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

22040913761

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 7, 1991

Richard Shepard, Esq.
3701 South 12th Street
Tacoma, WA 98405

RE: MUR 3177

Dear Mr. Shepard:

On February 5, 1991, the Federal Election Commission received your letter dated January 30, 1991. In your letter, you note that pursuant to 2 U.S.C. § 455, the statute of limitations has apparently run in regard to the complaint filed with the Commission.

We direct your attention to Federal Election Commission v. Lance, 617 F.2d 365 (5th Cir. 1980), in which the Fifth Circuit stated that 2 U.S.C. § 455 is applicable to criminal actions, not civil actions, for violations of the Federal Election Campaign Act. Id. at 372. We have enclosed a copy of Federal Election Commission v. Lance for your information.

Please submit your response to the complaint to the General Counsel's Office within 15 days of receipt of this letter. If you have any questions, please contact Mary Taksar, the attorney assigned to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure

2204091376 2

06C00063

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 12 AM 11:04

7 February 1991

RE: MUR 3177

Attention:

Lawrence M. Noble
General Counsel
FEC
999 E Street NW
Washington DC 20463

A few days ago, I received a copy of your MUR 3177 which did not include "Page 2 of 5" or "Page 4 of 5" of the complaint. I seem to have received only odd-numbered pages throughout this MUR document. At least in the portion of the complaint you sent me, I am not even mentioned, much less accused of violations of "the Act."

My only association with LPWS/CSG was that I was appointed by the Libertarian Party National Committee to a committee to negotiate a contract between the Libertarian Party National Committee and the LPWS/CSG. Unfortunately, prior to my appointment, the LPWS/CSG had already been awarded the bid for the National Convention by the Libertarian National Committee; and our convention committee had no bargaining power. Many contract versions were attempted. None were ever signed. Our convention committee was disolved with the advent of the Convention and no contract.

Honey Lanham

Honey Lanham
4327 Sexton
Dallas TX 75229

91 FEB 12 PM 2:47

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

2204091337763

OGC 0192

Richard Shepard
Attorney at Law
3701 South 12th Street
Tacoma, Washington 98405
(206) 752-1189

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 27 PM 1:41

RECEIVED
FEDERAL ELECTION COMMISSION
91 FEB 27 PM 3:14

February 18, 1991

Ms. Lois G. Lerner
c/o Federal Elections Commission
Washington, D.C. 20463

Re: MUR 3177; Complaint of Alan Lindsay

Dear Ms. Lerner:

Yours of February 7, 1991, is received.

I have never been a Director of or advisor to LPWS-Convention Services or the Invisible Hand Foundation. Between December, 1986, and September, 1987, I was employed as Registered Agent for CSG.

During my employment with CSG, and except as required by law of a Registered Agent, keeping official records or making reports to government entities were not part of my employment responsibilities. I have never seen or had control over the financial records or affairs of either corporation.

In September, 1987, when my employment was terminated, all significant CSG documents and materials then in my possession were turned over to CSG officials. Since then I have had no part in the activities of either CSG or IHF.

Trusting that the foregoing is satisfactory, I remain

Very Truly Yours,

RICHARD SHEPARD

cc: Mr. Robert Sailer, Esq.

2204021337764

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 MAY 15 AM 10:49

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

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR # 3177
DATE COMPLAINT RECEIVED
BY OGC 11/16/90
DATE OF NOTIFICATION TO
RESPONDENTS 11/21/90
STAFF MEMBER Mary Taksar

COMPLAINANT: Alan Lindsay

RESPONDENTS: Libertarian National Committee and Stephen R. Fielder, as treasurer
William Bradford
Honey Lanham
James Turney
Richard Shepard
Michael Holmes
Jack Allard
The Invisible Hand Foundation, Successor to LPWS Convention Services Group
David Jones
Bettina Carter
Karen Allard
Ruth Bennett

RELEVANT STATUTES: 2 U.S.C. § 437
11 C.F.R. § 9008.1(b)
11 C.F.R. § 9008.12(b)

INTERNAL REPORTS CHECKED: 1987 Year-End Report
1988 April Quarterly

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by a complaint filed by Alan Lindsay on November 16, 1990. In his complaint,

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Mr. Lindsay alleged that LPWS Convention Services Group[1] received contributions and made expenditures in connection with the 1987 National Libertarian Committee Nominating Convention[2] and that LPWS-CSG failed to register with the Federal Election Commission ("Commission") and report such contributions and expenditures to the Commission. See Attachment 1, Page 2. In addition to naming LPWS-CSG in his complaint, Mr. Lindsay also named current and former officers of LPWS-CSG.[3] During its review of the complaint, this Office included additional individuals and the National Libertarian Committee and Stephen R. Fielder, as treasurer, as respondents based on the allegations in the complaint.[4]

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1. LPWS Convention Services Group ("LPWS-CSG") was incorporated in the State of Washington on December 23, 1986 as a non-profit corporation. On September 25, 1989, LPWS-CSG filed an amendment to its Articles of Incorporation changing its name to The Invisible Hand Foundation.

2. The National Libertarian Committee Nominating Convention was held during Labor Day Weekend 1987.

3. These individuals include Ruth Bennett, Karen Allard, Bettina Carter, and David Jones. From this Office's review of the complaint, it appears that Ruth Bennett, Bettina Carter, and David Jones were the three original officers of LPWS-CSG and that Karen Allard became an officer of LPWS-CSG in August 1989. In his complaint, Mr. Lindsay also named Richard Shepard, the registered agent of LPWS-CSG until September 2, 1987.

4. After reviewing the complaint, this Office added Jack Allard, William Bradford, Honey Lanham, James Turney, and Michael Holmes as respondents.

In his complaint, Mr. Lindsay refers to the Washington State Libertarian Party. The Washington State Libertarian Party is not registered with the Commission. According to the the Public Disclosure Commission for the State of Washington, the Washington State Libertarian Party is not registered in the State of Washington. Therefore, because we could not determine whether the Washington State Libertarian Party exists or where it may be located, no notification letter was sent to the

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that each committee or other organization which represents a national political party in making arrangements for the convention of such party to nominate a Presidential or Vice-Presidential candidate must file a full and complete financial statement with the Commission. 2 U.S.C. § 437(2). Each committee or other organization, including a national committee, which represents a national major, minor, or new political party in making arrangements for the party's convention held to nominate a Presidential or Vice-Presidential candidate must register with the Commission on FEC Form 1 as a political committee and file disclosure reports. 11 C.F.R. § 9008.12(b). Such committee or organization must file a quarterly report on FEC Form 4 no later than 10 days after the the first quarter in which a committee either receives contributions or makes expenditures to defray convention expenses. 11 C.F.R. § 9008.12(b)(2)(ii). Quarterly reports must be completed as of the close of the quarter and must continue to be filed until such committee ceases activity in connection with the nominating convention. Id. Any quarterly report due within 20 days before or after the convention is suspended and the committee must file a post-convention report instead of a quarterly report. Id. The post convention report must be filed on the earlier of 60 days following the last day

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(Footnote 4 continued from previous page)
Washington State Libertarian Party.

the convention is officially in session or 20 days prior to the presidential general election and must be complete as of 15 days prior to the date on which the report must be filed. Id. This reporting obligation applies to all committees or organizations regardless of whether or not the committees or organizations used public funds to defray convention expenses. Id. The term "nominating convention" means a convention, caucus, or other meeting which is held by a political party at the national level and which chooses the presidential nominee of the party through selection by delegates to that convention or through other similar means. 11 C.F.R. § 9008.2.

The Act states that it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal election. 2 U.S.C. § 441b(a). It is unlawful for a political committee to knowingly accept or receive any contribution prohibited by 2 U.S.C. § 441b. Id. The term "election" means a general, special, primary or run-off election or a convention or caucus of a political party which has authority to nominate a candidate. 2 U.S.C. § 431(1).

A. The National Libertarian Committee and Stephen R. Fielder, as Treasurer

Counsel for The Invisible Hand Foundation ("IHF"), Successor to LPWS-CSG, states that it is the practice of the National Libertarian Committee to create a Convention Oversight Committee to enter into a written or verbal contract with an independent contractor to provide convention services. See Attachment 2, Page 4. He notes that this practice, which has

2204091376 8

been in effect since the first National Libertarian Convention was held in 1971, was followed for the 1987 Convention. Counsel states that in August 1985, the National Libertarian Committee selected Seattle for the site of the 1987 National Nominating Convention. See Attachment 2, Page 3. Counsel notes that the National Libertarian Committee was involved in contract negotiation with H. Barron Enterprises and that in October 1986, when H. Barron Enterprises was unable to perform the proposal, negotiations were terminated. According to counsel, the contract was eventually awarded to a group in Seattle-Tacoma which had commenced with pre-incorporation steps in October 1986. This group became incorporated on December 23, 1986 under the name LPWS Convention Services Group.

Counsel indicates that no Oversight Committee was appointed by National Libertarian Committee Chairman, James Turney, until April 1987.[5] See Attachment 2, Page 4. In April 1987, Mr. Turney appointed Michael Holmes, as chairman, and Matt Monroe, and Honey Lanham, as members of the Oversight Committee.[6] See Attachment 2, Pages 3-4. Counsel states that although no written contract was completed, the Oversight Committee functioned to police the efforts of LPWS-CSG prior to and throughout the convention proceedings.

In his response to the complaint, Michael Holmes states

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5. The timeline included in the complaint indicates that although an Oversight Committee had existed previously, it had not functioned since August 1985.

6. As chairman of the Oversight Committee, Michael Holmes reported to Mr. Turney.

2204091376 9

that he volunteered to serve on the National Libertarian Convention Oversight Committee. See Attachment 3, Page 1. Mr. Holmes notes that the Convention Oversight Committee was charged with the responsibility of negotiating a contract with LPWS-CSG. He indicates that during the spring and early summer of 1987, the Oversight Committee, acting on behalf of the the Libertarian National Committee, prepared and revised several drafts of the convention contract with LPWS-CSG. See Attachment 3, Page 1. Mr. Holmes notes that all drafts were ultimately returned by Ruth Bennett, LPWS-CSG's president, and that although no contract had been signed, LPWS-CSG continued to proceed with advertising and organization of the convention arrangements, speakers, facilities, and related matters. See Attachment 3, Pages 1-2. He also indicates that by Mid-July, the Oversight Committee realized that it could not resolve its differences with LPWS-CSG and, therefore, it referred the matter back to the National Libertarian Committee. See Attachment 3, Page 2. He notes that James Turney,[7] Chairman of the National Libertarian Committee, attempted to resolve differences with LPWS-CSG during the pre-convention session but that ultimately no contract was formed.

As noted earlier, Honey Lanham was also a member of the Oversight Committee. In response to the complaint, she states that her only association with LPWS-CSG was that she was on the

7. This Office notified James Turney of the complaint, however, he did not respond. This Office has a copy of the certified receipt signed by Mr. Turney for the reminder letter which was sent to him.

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committee to negotiate a contract between the National Libertarian Committee and LPWS-CSG. See Attachment 4. She notes that prior to her appointment, LPWS-CSG had already been awarded the bid for the convention. She states that many contract versions were attempted but none were ever signed and that the Oversight Committee was dissolved with the advent of the convention.

It appears that the Oversight Committee, in contrast to a typical arrangements committee, did not authorize payments nor become involved in any matters other than negotiating a contract with LPWS-CSG. It also appears that although the Oversight Committee still existed after it referred the contract negotiations back to the National Libertarian Committee, for all practical purposes, it ceased to function in Mid-July of 1987.

As noted above in the discussion of Mr. Holmes' response, in drafting and revising the contract for convention services, the Oversight Committee was "acting on behalf of the National Libertarian Committee." See Attachment 3, Page 1. Therefore, it appears that the Oversight Committee represented or was an agent of the National Libertarian Committee in attempting to negotiate a contract with LPWS-CSG for the Presidential Nominating Convention. Although no contract was ever signed, the Oversight Committee was given authority by the National Libertarian Committee to negotiate a contract with LPWS for the provision of convention services which LPWS eventually provided. Thus, it appears that the National Libertarian Committee, in part, through the Oversight Committee, allowed LPWS-CSG to

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provide the convention services.

A review of the National Libertarian Committee reports disclosed the following expenditures relating to the convention: payments made to LPWS-CSG for convention services; payments made to Tonie Nathan, LPWS-CSG's media director; and payments to LPWS-CSG for exhibition space. The reports did not include receipts of contributions or convention fundraising events and expenditures made for the convention by LPWS-CSG.

B. The Invisible Hand Foundation, Successor to LPWS-CSG

According to the complaint, in 1987, Karen Allard, Ruth Bennett, David Jones, Richard Shepard and Bettina Carter, along with other individuals in Washington State, organized and hosted the Libertarian Committee's Presidential Nominating Convention which selected nominees for the 1988 general election. See Attachment 1, Page 2. The complaint alleges that LPWS-CSG expended funds to promote the convention and the National Libertarian Committee and that LPWS-CSG arranged various convention functions.[8] The complaint states that the individuals who handled these convention arrangements operated as LPWS-CSG. Although it appears that no contract was ever signed between the National Libertarian Committee and LPWS-CSG, the National Libertarian Committee made some payments to LPWS-CSG for services rendered. See Attachment 1, Page 10.

According to the minutes of an LPWS-CSG meeting which was included in the complaint, LPWS-CSG issued a bill to the

8. It appears that LPWS is an acronym which stands for Libertarian Party of Washington State.

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National Libertarian Committee for photocopying documents and expenses accrued by LPWS-CSG's media director. The National Libertarian Committee apparently offered a settlement proposal for payment which was accepted by LPWS-CSG in January 1988. The total bill in the amount of $2,901.78 was paid in installments and it appears that payments were made by the National Libertarian Committee until March 1989. See Attachment 1, Page 10.

A review of the Committee's reports revealed payments made to LPWS-CSG and to Tonie Nathan, LPWS-CSG's media director. Payments made to LPWS-CSG as part of the settlement are as follows: $901.78 on August 12, 1988; $100 on November 23, 1988; $500 on January 31, 1989; $500 on February 28, 1989; and $900 on March 31, 1989. The Committee made two $150 payments to LPWS-CSG on June 17, 1987 and June 26, 1987 for exhibit booths. Payments made to Tonie Nathan for media expenses and expense reimbursement are as follows: $305 on November 20, 1987; $535.59 on December 15, 1987; $250 on March 3, 1988; $195.28 on April 27, 1988; $195.28 on May 31, 1988; $245.42 on March 23, 1989; $401.20 on June 15, 1989; and $100 on June 28, 1989.

A letter dated December 23, 1989 and signed by Bettina Carter, the treasurer of IHF, Successor to LPWS-CSG, which discusses LPWS-CSG's expenses for the 1987 National Nominating Convention was included as part of the complaint. This letter refers to expenses which relate to flowers, taxi cab transportation, mugs, pens, keyrings, notebooks, walkie talkies, security, decorations, and signs. See Attachment 1, Page 7.

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The letter also refers to expenses for a banquet, a cruise, rock and roll entertainment and the salary of the director. It appears from this letter that LPWS-CSG expended $110,450 for the convention. Although no figure was provided for the contributions or funds received by LPWS-CSG, it appears that if LPWS-CSG was making expenditures for banquets, a cruise, and seminars, it must also have received contributions or ticket fees from the individuals who attended these functions.

In his response to the complaint, counsel for IHF, Successor to LPWS-CSG, Ruth Bennett, Karen Allard, Jack Allard, David Jones, Richard Shepard, and Bettina Carter states that the corporation is not and never has been a committee or affiliate of any national, state, or local party or an organizing or host committee.[9] See Attachment 2, Pages 2-3. According to counsel, at all times, the corporation has performed services, provided products, and conducted itself as an independent contractor with full risk and liability of loss or profit. See Attachment 2, Page 3.

In regard to the 1987 National Libertarian Nominating Convention, counsel states that the convention contract was verbally awarded to LPWS-CSG. He indicates that the terms of

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9. The complaint states that although the documentary evidence is sparse, LPWS-CSG appears to be a subcommittee of the Washington State Libertarian Party. See Attachment 1, Page 2. This Office notes that additional information is needed to determine whether or not LPWS-CSG was a subcommittee of the Washington State Libertarian Party or what the relationship is between the two. As noted earlier, according to the Public Disclosure Commission of the State of Washington, the Washington State Libertarian Party is not registered in the State of Washington.

the contract required that LPWS-CSG supply physical arrangements, food, vendor space, speakers, literature, program format, and support services for the convention. See Attachment 2, Page 3. Counsel states that LPWS-CSG was also responsible for coordinating photocopying services, media contact, times, and space for convention business with the National Libertarian Committee in order to ensure that vendor activities and major convention business did not conflict with the nominating business of the convention. See Attachment 2, Pages 3-4.

Counsel further states that LPWS-CSG accepted full responsibility for all losses under the verbal contract and was granted the rights to any profits resulting from the provision of services.[10] According to counsel, all funds to finance the operations of the corporation were generated by LPWS-CSG profit-making functions which were within the guidelines of Internal Revenue procedures. See Attachment 2, Page 4. He states that LPWS-CSG raised funds for the corporation's operation by selling LibertyBucks or coupons in return for seminars, cruises, entertainment functions, and services available to attendees of the convention.[11] Counsel notes that

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10. In his response to the complaint, Mr. Holmes states that in addition to being on the Oversight Committee, he was an exhibitor at the convention and that he made all of his payments directly to LPWS-CSG. See Attachment 3, Page 2. He further notes that LPWS-CSG received all payments earned by the convention except for the proceeds of one fundraising event, a banquet.

11. Counsel notes that convention attendees were admitted to the convention without charge by the National Libertarian Committee.

the corporation raised funds by selling advertising and booth space at the hotel and that the hotel provided space without charge to LPWS-CSG in return for hotel room and meal bookings.[12] See Attachment 2, Page 5. Counsel further notes that the convention contract enabled LPWS-CSG to raise the money needed to operate the corporation in 1987. Counsel also states that no

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12. This Office notes that the issue of a possible corporate contribution arises because it appears that the arrangement was made between the National Libertarian Committee and the hotel because LPWS-CSG acted as the agent of or an arrangements committee for the National Libertarian Committee. According to Advisory Opinion 1975-1, the provision of space without charge would not be considered a corporate contribution in these circumstances. In Advisory Opinion 1975-1, the Commission states that a corporation does not violate the prohibition on corporate contributions when it gives a national party convention the use of certain facilities without apparent charge when the convention purchases a certain minimum quantity of products or services from the corporation. The Commission views this arrangement as details of an overall purchase agreement if the reduction and/or facilities are offered in the ordinary course of business to nonpolitical conventions as well as to political conventions. If, in fact, the National Libertarian Committee was given free exhibit space at the hotel in exchange for booking rooms and meals for the convention attendees at the hotel, according to Advisory Opinion 1975-1, this arrangement would be permissible provided that the hotel allowed such an arrangement for non-political conventions.

Advisory Opinion 1988-25 provides further support that a national political party is sometimes allowed to receive free services and discounts. In Advisory Opinion 1988-25, the Commission decided that General Motors Corporation's proposal to loan their vehicles to national nominating conventions without charge would not result in a corporate contribution. The Commission stated that although the vehicle loan program did not fall within the specific exemptions delineated in the national nominating convention regulations, the program fell within the parameters of the kind of activity sanctioned by those regulations. The Commission stated that its decision was based on the following factors: GM's established practice of loaning vehicles for non-political events; the assumption that the value provided is proportionate to the value provided in similar situations; the commercial benefit that underlies the program; the assumption that the commercial benefit is not outweighed by the value provided; and the unique promotional versus political opportunities that a national nominating convention presents.

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funds, political contributions or campaign donations were received or used by LPWS-CSG for the convention.[13] See Attachment 2, Page 5.

C. Conclusion

Therefore, it appears that LPWS-CSG, operating as a corporate organization, made many of the arrangements for the National Libertarian Convention, raised funds for the convention, and expended approximately $110,450 for the convention. Thus, it appears that LPWS-CSG may have been required to register with the Commission on FEC Form 1 and may not have been an independent contractor as it claims. LPWS-CSG may also have been required to file a financial statement within the earlier of 60 days after the convention or 20 days prior to the election and file quarterly reports for the quarters in which it received contributions or made expenditures for the convention. As a national committee, the National Libertarian Committee had the ultimate responsibility of ensuring that a committee making arrangements for the convention registered and reported receipts and disbursements or that if it served as its own arrangements committee, it include the receipts and disbursements for the convention in its own reports. Therefore, it appears that the National Libertarian Committee may have also failed to disclose contributions received and expenditures made

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13. Counsel does not provide any basis for this conclusion. It appears inconsistent for counsel to state that no funds were received or used by LPWS-CSG for the convention when it appears that LPWS-CSG would have used funds received through convention fundraising to pay for convention expenses.

by LPWS-CSG for the purpose of promoting, planning, and carrying out the 1987 National Libertarian Nominating Convention.

Thus, this Office recommends that the Commission find reason to believe that the National Libertarian Committee and Stephen R. Fielder, as treasurer, violated 2 U.S.C. § 437 , 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) by failing to fully disclose contributions and expenditures relating to the convention or ensuring that the organization or committee making arrangements for the convention fully disclose contributions and expenditures relating to the convention. Alternatively, this Office recommends that the Commission find reason to believe that the The Invisible Hand Foundation, Successor to LPWS-CSG, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) by failing to register with the Commission and to file quarterly reports disclosing contributions received and expenditures made regarding the convention.

In addition, this Office recommends that the Commission find no reason to believe that Ruth Bennett, Karen Allard, Jack Allard, David Jones, Bettina Carter and William Bradford, as current and former officers,[14] and Richard Shepard[15] violated

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14. According to the complaint, Mr. Bradford is a director of IHF, Successor to LPWS-CSG. In his response to the complaint, he stated that he attended the 1987 convention but that he had no relation to LPWS-CSG at that time. See Attachment 5. He also stated that it was not until the Summer of 1990 that he became involved with the successor to LPWS-CSG, IHF. Id.
Jack Allard and Karen Allard were not officers of LPWS-CSG at the time LPWS-CSG provided convention services. They were elected officers of LPWS-CSG in August 1989.

15. As noted earlier, Richard Shepard was the registered agent of LPWS-CSG.

2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). We also are recommending that the Commission find no reason to believe that Michael Holmes, Honey Lanham, and James Turney violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) in that the facts do not indicate that they functioned as a typical arrangements committee.

III. PROPOSED DISCOVERY

If the Commission finds reason to believe that National Libertarian Committee and Stephen R. Fielder, as treasurer, and/or LPWS-CSG violated the Act and the Regulations, this Office plans to send interrogatories to the respondents. The subject areas which this Office plans to address are: the relationship between the National Libertarian Committee, the Libertarian Party of Washington State, and LPWS-CSG; National Libertarian Committee activities regarding the planning and sponsoring of the nominating convention; the source of funds used for convention expenditures; the contributions received and expenditures made for the convention; and the reporting of contributions and expenditures for the convention.

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IV. RECOMMENDATIONS

1. Find reason to believe that the National Libertarian Committee and Stephen R. Fielder, as treasurer, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b).

2. Find reason to believe that The Invisible Hand Foundation, Successor to LPWS-CSG, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b).

3. Find no reason to believe that Ruth Bennett, Karen Allard, Bettina Carter, David Jones, Jack Allard, and William Bradford, as former and current officers, and Richard Shepard violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) and close the file as it pertains to them.

4. Find no reason to believe that Michael Holmes, Honey Lanham, and James Turney violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) and close the file as it pertains to them.

5. Approve the appropriate letters and attached factual and legal analyses.

5/14/91
Date

Lawrence M. Noble
General Counsel

Attachments
1. Complaint
2. IHF response
3. Holmes response
4. Lanham response
5. Bradford response
6. Factual and Legal Analyses (2)

Staff Assigned: Mary Taksar

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 3177
Libertarian National Committee and	)	
Stephen R. Fielder, as treasurer;	)	
William Bradford; Honey Lanham;	)	
James Turney; Richard Shepard;	)	
Michael Holmes; Jack Allard;	)	
The Invisible Hand Foundation,	)	
Successor to LPWS Convention	)	
Services Group; David Jones;	)	
Bettina Carter; Karen Allard;	)	
Ruth Bennett.	)	

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CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 4, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3177:

1. Find reason to believe that the National Libertarian Committee and Stephen R. Fielder, as treasurer, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b).

2. Find reason to believe that The Invisible Hand Foundation, Successor to LPWS-CSG, violated 2 U.S.C. § 437, 11 C.F.R. §9008.1(b), and 11 C.F.R. § 9008.12(b).

(continued)

3. Find no reason to believe that Ruth Bennett, Karen Allard, Bettina Carter, David Jones, Jack Allard, and William Bradford, as former and current officers, and Richard Shepard violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) and close the file as it pertains to them.

4. Find no reason to believe that Michael Holmes, Honey Lanham, and James Turney violated 2 U.S.C. § 437, 11 C.F.R. §9008.1(b), and 11 C.F.R. § 9008.12(b) and close the file as it pertains to them.

5. Approve the appropriate letters and Factual and Legal Analyses as recommended in the General Counsel's report dated May 14, 1991.

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

Attest:

6-4-91
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Mr. William Bradford
c/o Liberty Magazine
P.O. Box 1167
Port Townsend, WA 98368

RE: MUR 3177
William Bradford

Dear Mr. Bradford:

On November 21, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On June 4, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe you violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. 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.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Mr. Michael Holmes
21715 Park Brook Drive
Katy, TX 77450

RE: MUR 3177
Michael Holmes

Dear Mr. Holmes:

On November 21, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On June 4, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe you violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. 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.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Ms. Honey Lanham
4327 Sexton
Dallas, TX 75229

RE: MUR 3177
Honey Lanham

Dear Ms. Lanham:

On November 21, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On June 4, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe you violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. 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.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Mr. James Turney
2214 Hay Road
Richmond, VA 23224

RE: MUR 3177
James Turney

Dear Mr. Turney:

On November 21, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On June 4, 1991, the Commission found, on the basis of the information in the complaint, that there is no reason to believe you violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. 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.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Robert O. Sailer, Esq.
Sailer & Co., P.S.
16770 N.E. 79 Street, Suite 205
Redmond, WA 98052

RE: MUR 3177
The Invisible Hand Foundation,
Successor to LPWS-CSG,
Ruth Bennett, Bettina Carter,
Karen Allard, David Jones,
Richard Shepard, and Jack Allard

Dear Mr. Sailer:

On November 21, 1990, the Federal Election Commission notified your clients, The Invisible Hand Foundation, Successor to LPWS-CSG, Ruth Bennett, Bettina Carter, Karen Allard, David Jones, Richard Shepard, and Jack Allard of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on June 4, 1991, found that there is reason to believe The Invisible Hand Foundation, Successor to LPWS-CSG, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b), provisions of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

On June 4, 1991, the Commission also found that there is no reason to believe Ruth Bennett, Bettina Carter, Karen Allard, David Jones, Richard Shepard, and Jack Allard violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). Accordingly, the Commission closed the file in this matter as it pertains to Ruth Bennett, Bettina Carter, Karen Allard, David Jones, Richard Shepard, and Jack Allard.

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Under the Act, you have an opportunity to demonstrate that no action should be taken against The Invisible Hand Foundation, Successor to LPWS-CSG. 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 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 Invisible Hand Foundation, Successor to LPWS-CSG, 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

John Warren McGarry
Chairman

Enclosures
Questions
Factual & Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 3177
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: The Invisible Hand Foundation, Successor to LPWS-CSG
c/o Robert O. Sailer Esq.
Sailer & Co., P.S.
16770 N.E. 79th Street, Suite 205
Redmond, Washington 98052

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.

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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 January 1986 to December 1989.

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.

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1. Article III of the articles of incorporation filed by LPWS-CSG on December 23, 1986 with the Secretary of State in Washington state that "[t]he purposes for which the corporation is organized are as follows: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 U.S.C. Section 527), as amended, and, any other lawful purpose that political organizations may engage in."

a. State with more specificity why LPWS-CSG was formed.

b. State whether LPWS-CSG has ever engaged in convention activities other than those relating to the 1987 National Libertarian Nominating Convention.

c. If so, identify the convention involved and describe in detail the activities in which LPWS-CSG engaged.

d. State whether LPWS-CSG has ever engaged in business activities other than those relating to the 1987 National Libertarian Convention.

e. If so, describe such business activities in detail.

2. a. State the relationship between LPWS Convention Services Group ("LPWS-CSG") and the National Libertarian Committee.

b. State the relationship between LPWS-CSG and the Libertarian Party of Washington State.

c. State the relationship between LPWS-CSG and the National Libertarian Oversight Committee for the 1987 Nominating Convention.

d. Describe in detail the duties of LPWS-CSG in regard to the 1987 National Libertarian Nominating Convention.

e. Describe any and all authority granted to LPWS-CSG by the National Libertarian Committee in regard to the 1987 Nominating Convention and how such authority was granted.

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f. Identify who LPWS-CSG reported to for convention purposes.

g. Identify who had authority to direct what LPWS-CSG did.

h. Identify who had responsibility for what LPWS-CSG did or did not do regarding the convention.

3. Identify all events which were fundraising events for the 1987 National Libertarian Nominating Convention by providing the name of each event and the date on which each event was held.

4. a. State whether LPWS-CSG directly received funds or contributions for convention fundraising events or activities.

b. Identify total funds or contributions received by the LPWS-CSG for convention fundraising events or activities.

c. Identify total funds or contributions received by LPWS-CSG for <u>each</u> convention fundraising event or activity.

d. State whether LPWS-CSG expended funds for convention fundraising events or activities.

e. Identify total expenses incurred by LPWS-CSG for convention fundraising events or activities.

f. Identify total funds expended by LPWS-CSG for <u>each</u> convention fundraising event or activity.

5. a. State how the convention was funded.

b. Identify who paid for the convention and the source of the funds used to pay for <u>each</u> convention activity or fundraising event.

c. Describe in detail how funds raised at convention fundraising events and activities were used.

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6. a. State whether LPWS-CSG transferred any funds or contributions received from convention fundraising events or activities to the National Libertarian Committee.

b. If so, identify the event, the date of the event, and the amount and date of the transfer.

c. State whether the National Libertarian Committee transferred any funds to LPWS-CSG for the convention or for preparation and planning of the convention.

d. If so, identify the amount, date, and purpose of any transfers.

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: The Invisible Hand Foundation, Successor to LPWS-CSG **MUR: 3177**

This is a matter generated by a complaint filed by Alan Lindsay. In his complaint, Mr. Lindsay alleged that LPWS Convention Services Group received contributions and made expenditures in connection with the 1987 National Libertarian Committee Nominating Convention and that LPWS-CSG failed to register with the Federal Election Commission ("Commission") and report such contributions and expenditures to the Commission.

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that each committee or other organization which represents a national political party in making arrangements for the convention of such party to nominate a Presidential or Vice-Presidential candidate must file a full and complete financial statement with the Commission. 2 U.S.C. § 437(2). Each committee or other organization, including a national committee, which represents a national major, minor, or new political party in making arrangements for the party's convention held to nominate a Presidential or Vice-Presidential candidate must register with the Commission on FEC Form 1 as a political committee and file disclosure reports. 11 C.F.R. § 9008.12(b). Such committee or organization must file a quarterly report on FEC Form 4 no later than 10 days after the the first quarter in which a committee either receives contributions or makes expenditures to defray convention

expenses. 11 C.F.R. § 9008.12(b)(2)(ii). Quarterly reports must be completed as of the close of the quarter and must continue to be filed until such committee ceases activity in connection with the nominating convention. Id. Any quarterly report due within 20 days before or after the convention is suspended and the committee must file a post-convention report instead of a quarterly report. Id. The post convention report must be filed on the earlier of 60 days following the last day the convention is officially in session or 20 days prior to the presidential general election and must be complete as of 15 days prior to the date on which the report must be filed. Id. This reporting obligation applies to all committees or organizations regardless of whether or not the committees or organizations used public funds to defray convention expenses. Id. The term "nominating convention" means a convention, caucus, or other meeting which is held by a political party at the national level and which chooses the presidential nominee of the party through selection by delegates to that convention or through other similar means. 11 C.F.R. § 9008.2.

According to the complaint, in 1987, Karen Allard, Ruth Bennett, David Jones, Richard Shepard, and Bettina Carter, along with other individuals in Washington State, organized and hosted the Libertarian Committee's Presidential Nominating Convention which selected nominees for the 1988 general election. The complaint alleges that LPWS-CSG expended funds to promote the convention and the National Libertarian Committee and that LPWS-CSG arranged various convention functions. The

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complaint states that the individuals who handled these convention arrangements operated as LPWS-CSG. Although it appears that no contract was ever signed between the National Libertarian Committee and LPWS-CSG, the National Libertarian Committee made some payments to LPWS-CSG for services rendered.

According to the minutes of an LPWS-CSG meeting which was included in the complaint, LPWS-CSG issued a bill to the National Libertarian Committee for photocopying documents and expenses accrued by LPWS-CSG's media director. The National Libertarian Committee apparently offered a settlement proposal for payment which was accepted by LPWS-CSG in January 1988. The total bill in the amount of $2,901.78 was paid in installments and it appears that payments were made by the National Libertarian Committee until March 1989.

A letter dated December 23, 1989 and signed by Bettina Carter, the treasurer of IHF, Successor to LPWS-CSG, which discusses LPWS-CSG's expenses for the 1987 National Nominating Convention was included as part of the complaint. This letter refers to expenses which relate to flowers, taxi cab transportation, mugs, pens, keyrings, notebooks, walkie talkies, security, decorations, and signs. The letter also refers to expenses for a banquet, a cruise, rock and roll entertainment and the salary of the director. It appears from this letter that LPWS-CSG expended $110,450 for the convention. Although no figure was provided for the contributions or funds received by LPWS-CSG, it appears that if LPWS-CSG was making expenditures for banquets, a cruise, and seminars, it must also have received

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contributions or ticket fees from the individuals who attended these functions.

In his response to the complaint, counsel for IHF, Successor to LPWS-CSG, states that the corporation is not and never has been a committee or affiliate of any national, state, or local party or an organizing or host committee. According to counsel, at all times, the corporation has performed services, provided products, and conducted itself as an independent contractor with full risk and liability of loss or profit. According to counsel, all funds to finance the operations of the corporation were generated by LPWS-CSG profit-making functions which were within the guidelines of Internal Revenue procedures.

In regard to the 1987 National Libertarian Nominating Convention, counsel states that although there was no written contract, the contract was awarded to LPWS-CSG. He indicates that the terms of the contract required that LPWS-CSG supply physical arrangements, food, vendor space, speakers, literature, program format, and support services for the convention. Counsel states that LPWS-CSG was also responsible for coordinating photocopying services, media contact, times, and space for convention business with the National Libertarian Committee in order to ensure that vendor activities and major convention business did not conflict with the nominating business of the convention. Counsel further states that LPWS-CSG accepted full responsibility for all losses under the verbal contract and was granted the rights to any profits resulting from the provision of services. He states that

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LPWS-CSG raised funds for the corporation's operation by selling LibertyBucks or coupons in return for seminars, cruises, entertainment functions, and services available to attendees of the convention. Counsel notes that the corporation raised funds by selling advertising and booth space at the hotel and that the hotel provided space without charge to LPWS-CSG in return for hotel room and meal bookings. Counsel further notes that the convention contract enabled LPWS-CSG to raise the money needed to operate the corporation in 1987. Counsel also states that no funds, political contributions or campaign donations were received or used by LPWS-CSG for the convention.

It appears that LPWS-CSG, operating as a corporate organization, made many of the arrangements for the National Libertarian Convention, raised funds for the convention, and expended approximately $110,450 for the convention. It also appears that LPWS-CSG may not have been an independent contractor.

Therefore, as an organization making arrangements for the nominating convention of a national political party, LPWS-CSG was required to register with the Commission on an FEC Form 1. LPWS-CSG was also required to file a financial statement within the earlier of 60 days after the convention or 20 days prior to the election and file quarterly reports for the quarters in which it received contributions or made expenditures for the convention. Therefore, it appears that LPWS-CSG failed to disclose the contributions received and expenditures it made for the purpose of promoting, planning, and carrying out the 1987

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National Libertarian Nominating Convention.

Thus, there is reason to believe that The Invisible Hand Foundation, Successor to LPWS-CSG, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) by failing to register with the Commission and to file quarterly reports disclosing contributions received and expenditures made regarding the convention.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1991

Mr. Stephen R. Fielder, Treasurer
The National Libertarian Committee
1528 Pennsylvania Avenue S.E.
Washington, D.C. 20003

RE: MUR 3177
The National Libertarian Committee and Stephen R. Fielder, Treasurer

Dear Mr. Fielder:

On November 21, 1990, the Federal Election Commission notified The National Libertarian Committee ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on June 4, 1991, found that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b), provisions of 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 National Libertarian Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against The National Libertarian Committee and you, as treasurer, the Commission may

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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 matter to be made public.

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

Sincerely,

John Warren McGarry
Chairman

Enclosures
Questions
Designation of Counsel Form
Factual & Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 3177

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Mr. Stephen R. Fielder, Treasurer
The National Libertarian Committee
1528 Pennsylvania Avenue 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.

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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 January 1986 to December 1989.

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. a. State the relationship between the National Libertarian Committee and the Libertarian Party of Washington State.

b. State the relationship between the National Libertarian Committee and LPWS Convention Services Group ("LPWS-CSG").

2. a. Identify the role of the Oversight Committee of the National Libertarian Committee for the 1987 Nominating Convention.

b. Describe in detail the duties performed by the Oversight Committee.

c. Describe the authority granted to this committee, including but not limited to payment authorization.

d. State whether the National Libertarian Committee had an arrangements committee.

e. If so, identify the arrangements committee and detail the duties performed by the arrangements committee.

3. Identify all fundraising events for the 1987 National Libertarian Nominating Convention by providing the name of each event and the date on which each event was held.

4. a. State whether the National Libertarian Committee directly received funds or contributions for fundraising events or convention activities.

b. If so, state whether these funds were deposited into a depository.

c. Identify the depository into which such funds were deposited.

5. a. Identify total funds or contributions received by the National Libertarian Committee for convention fundraising events or activities.

b. Identify total funds or contributions received by the National Libertarian Committee for <u>each</u> convention fundraising event or activity.

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6. a. State whether the National Libertarian Committee directly expended funds for fundraising events or convention activities.

b. Identify total expenses incurred by the National Libertarian Committee for convention fundraising events or activities.

c. Identify total funds expended by the National Libertarian Committee for each convention fundraising event or activity.

7. a. State whether the National Libertarian Committee transferred any funds to LPWS-CSG for the convention or for the preparation and planning of the convention and related activities.

b. Is so, identify the event, the date of the event, and the amount and date of any transfers.

c. State whether LPWS-CSG transferred any funds or contributions received from convention fundraising events or activities to the National Libertarian Committee.

d. If so, identify the event, the date of the event, and the amount and date of any transfers.

8. a. State how the convention was funded.

b. Identify who paid for the convention and the source of funds used to pay for each convention activity or fundraising event.

c. Describe in detail how funds raised at convention fundraising events and activities were used.

9. a. State whether the National Libertarian Committee reported any contributions or funds received and expenditures made relating to the convention in its reports filed with the Federal Election Commission ("Commission").

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b. If so, identify the contributions, funds, or expenditures relating to the convention which the National Libertarian Committee reported to the Commission.

c. If no reporting was made regarding the convention, state why the National Libertarian Committee failed to report financial activity regarding the convention to the Commission pursuant to 2 U.S.C. § 437(2).

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

Respondent: National Libertarian Committee and Stephen R. Fielder, as treasurer

MUR: 3177

This is a matter generated by a complaint filed by Alan Lindsay. In his complaint, Mr. Lindsay alleges that contributions received and expenditures made for the 1987 National Libertarian Committee Nominating Convention were not reported to the Federal Election Commission.

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that each committee or other organization which represents a national political party in making arrangements for the convention of such party to nominate a Presidential or Vice-Presidential candidate must file a full and complete financial statement with the Commission. 2 U.S.C. § 437(2). Each committee or other organization, including a national committee, which represents a national major, minor, or new political party in making arrangements for the party's convention held to nominate a Presidential or Vice-Presidential candidate must register with the Commission on FEC Form 1 as a political committee and file disclosure reports. 11 C.F.R. § 9008.12(b). Such committee or organization must file a quarterly report on FEC Form 4 no later than 10 days after the the first quarter in which a committee either receives contributions or makes expenditures to defray convention expenses. 11 C.F.R. § 9008.12(b)(2)(ii). Quarterly reports must be completed as of the close of the quarter and must

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continue to be filed until such committee ceases activity in connection with the nominating convention. Id. Any quarterly report due within 20 days before or after the convention is suspended and the committee must file a post-convention report instead of a quarterly report. Id. The post convention report must be filed on the earlier of 60 days following the last day the convention is officially in session or 20 days prior to the presidential general election and must be complete as of 15 days prior to the date on which the report must be filed. Id. This reporting obligation applies to all committees or organizations regardless of whether or not the committees or organizations used public funds to defray convention expenses. Id. The term "nominating convention" means a convention, caucus, or other meeting which is held by a political party at the national level and which chooses the presidential nominee of the party through selection by delegates to that convention or through other similar means. 11 C.F.R. § 9008.2.

It appears that James Turney, Chairman of the National Libertarian Committee, appointed Michael Holmes as chairman and Honey Lanham and Matt Monroe as members of the Oversight Committee for the 1987 National Libertarian Committee Nominating Convention. It was the Oversight Committee's function to negotiate a contract with LPWS-CSG, the corporation awarded the contract, for the provision of convention services.

It appears that LPWS-CSG began promoting and preparing for the 1987 Nominating Convention despite the fact that the Oversight Committee could not negotiate a written contract

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between LPWS-CSG and the National Libertarian Committee. In Mid-July 1987, when it became apparent to the Oversight Committee that no written contract could be negotiated, the Oversight Committee referred the matter back to the National Libertarian Committee, specifically to James Turney. It appears that Mr. Turney attempted to negotiate a contract but that his efforts were also unsuccessful. As noted earlier, the lack of a written contract did not hinder preparations for the Nominating Convention. LPWS-CSG continued to proceed with convention arrangements such as advertising and organization of the convention arrangements, speakers, facilities, and related matters.

It appears that the Oversight Committee, in contrast to a typical arrangements committee, did not authorize payments nor become involved in any matters other than negotiating a contract with LPWS-CSG. It also appears that although the Oversight Committee still existed after it referred the contract negotiations back to the National Libertarian Committee, for all practical purposes, it ceased to function in Mid-July of 1987.

It appears that the Oversight Committee represented or was an agent of the National Libertarian Committee in attempting to negotiate a contract with LPWS-CSG for the Presidential Nominating Convention. Although no contract was ever signed, the Oversight Committee was given authority by the National Libertarian Committee to negotiate a contract with LPWS-CSG for the provision of convention services which LPWS-CSG eventually provided. Thus, it appears that the National Libertarian

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Committee, in part, through the Oversight Committee, allowed LPWS-CSG to provide the convention services.

A review of the National Libertarian Committee reports disclosed the following expenditures relating to the convention: payments made to LPWS-CSG for convention services; payments made to Tonie Nathan, LPWS-CSG's media director; and payments to LPWS-CSG for exhibition space. The reports did not include receipts of contributions or convention fundraising events and expenditures made for the convention by LPWS-CSG.

Therefore, as a national political committee, the National Libertarian Committee had the ultimate responsibility of ensuring that a committee making arrangements for the convention registered and reported receipts and disbursements or that if it served as its own arrangements committee, it include the receipts and disbursements for the convention in its reports. Thus, it appears that the National Libertarian Committee failed to disclose contributions received and expenditures made by LPWS-CSG for the purpose of promoting, planning, and carrying out the 1987 National Libertarian Nominating Convention.

Therefore, there is reason to believe that the National Libertarian Committee and Stephen R. Fielder, as treasurer, violated 2 U.S.C. § 437 , 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b) by failing to fully disclose contributions and expenditures relating to the convention or ensuring that the organization or committee making arrangements for the convention fully disclose contributions and expenditures relating to the convention.

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OFFICE SERVICES BRANCH

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OFFICE OF GENERAL COUNSEL

91 JUN 26 PM 2:02

Libertarian National Committee
1528 Pennsylvania Avenue, S.E.
Washington, D.C. 20003
June 24, 1991

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Attn.: Mary Taksar

Re: MUR 3177--The Libertarian National Committee and Stephen R. Fielder, Treasurer

Dear Ms. Taksar:

As per our telephone conversation earlier today, I was appointed Treasurer of the Libertarian National Committee on April 28, 1991, replacing Mr. Fielder, and will act as the contact person with the FEC on this matter until further notice. For your information, I may be reached during regular business hours at (703) 478-5880.

As I indicated, due to the fact that many of the people involved in this matter no longer hold the positions they held prior to the 1987 convention and because they live in different locations in the U.S. and we need to speak with them in order to fully answer the FEC's questions, we are requesting a twenty (20) day extension to respond to your letter of June 14, 1991.

We received the letter on June 17, 1991, making the original deadline July 2, 1991. A twenty (20) day extension will make our response deadline July 22, 1991. Unless I hear differently from you, I will assume that the July 22, 1991 deadline is acceptable to the Federal Election Commission. I thank you in advance for your understanding and the extension of time for response.

Please feel free to call me at any time during normal business hours, if you have any questions or relevant information that you think I should know regarding this case. Thank you very much.

Sincerely,

William Redpath

William Redpath
Treasurer

cc: Nick Dunbar, LP National Director

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1991

Mr. William Redpath, Treasurer
Libertarian National Committee
1528 Pennsylvania Avenue, S.E.
Washington, D.C. 20003

RE: MUR 3177
National Libertarian Committee and
William Redpath, as treasurer

Dear Mr. Redpath:

This is in response to your letter dated June 24, 1991, which we received on June 26, 1991, requesting an extension of twenty (20) days to respond to the Commission's reason to believe 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 July 22, 1991.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

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SAILER & CO., P.S.
General Business & International Law

16770 N.E. 79th St., Suite 205
Redmond, WA 98052

Tel: (206) 867-0812
Fax: (206) 883-4616

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

July 10, 1991

Mary Taksar
Attorney at Law
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Complaint No. MUR 3177

Dear Ms. Taksar:

We are in receipt of your letter to our client, The Invisible Hand Foundation, dated June 14, 1991 signed by John Warren McGarry, Chairman, Federal Election Commission.

No Action - Our client strongly believes and demonstrates below that no action should be taken against the Invisible Hand Foundation ("IHF"), successor to the LPWS Convention Services Group ("LPWS-CSG"- Note: LPWS are not the initials for the Libertarian Party of Washington State).

Logistics Organizer - IHF, formerly known as LPWS-CSG, was the logistics organizer of the 1987 Convention, **a service-for-hire company**, and not a political committee of the National Libertarian Party ("NLP") Libertarian Party of Washington State ("L.P.W.S.") for the Convention or a local community host committee. Any political fundraising done at the Convention was conducted by the organizing committees of the prospective Presidential candidates after the Banquet event and before the entertainment event, and all proceeds were retained by the NLP or committees of the prospective Presidential candidates.

Answers to Questions - We submit the following answers to the list of questions enclosed with your letter of June 14th on behalf of our client, The Invisible Hand Foundation, a non-profit foundation registered in the State of Washington:

1. Article III of the Articles of Incorporation

   1.a IHF was formed as a business entity by three business-persons to produce conventions and conferences, and seminars, commencing with its initial effort to obtain a contract with the National Libertarian Party to produce

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OFFICE OF GENERAL COUNSEL

the 1987 national convention for the National Libertarian Party.

1.b The IHF has not produced any other conventions or engaged in any other convention activities other than those relating to the 1987 National Libertarian Nominating Convention. It has offered limited consulting for other seminars, conferences and meetings for non-political groups.

1.c No other conventions.

1.d Other business activities included publication of educational information, grants to various non-profit organizations, and discussions by the Board of Directors of business opportunities (e.g., newsletter for sale, etc.).

1.e Efforts have been made to market the services of the IHF through distribution of newsletters (2) and ad mailings, and bid unsuccessfully on one or two conferences.

2. Relationship between IHF and the National Libertarian Committee.

2.a IHF and the National Libertarian Party ("NLP") have always been and remain two separate legal entities. The NLP was responsible during the 1987 Convention for all political Party matters, such as Bylaws and Rules revisions, Party Platform, election of national officers and the national committee, selection of Presidential/Vice Presidential candidates. IHF was responsible for the delivery of convention services, such as logistics for meeting rooms and guest rooms, social events and entertainment, transportation and speaker arrangements.

2.c IHF and the Libertarian Party of Washington State have always been two separate legal entities. IHF was awarded a contract to provided organizational and administrative services for the 1987 Convention when the Libertarian Party of Washington State was unable to do so for the National Party.

2.d IHF entered into its own contract with a Seattle hotel for guest rooms and meeting room space, negotiated

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and contracted with entertainment speakers and social event service firms, arranged exhibit space and solicited exhibitors for such space.

2.e IHF operated under a legally binding, verbal contract with the NLP. The NLP exercised no authority and accepted no responsiblity for obligations incurred by IHF with exhibitors, the hotel, or vendors and suppliers of other goods and services.

No NLP oversignt committee was appointed by the NLP until April 1987, and thereafter the only actions of said oversight committee was to clarify liability issues of the verbal contract. In August 1987, Honey Lanham, Chair of the oversight committee, communicated with the IHF to inquire about the progress of the arrangements. No written contract was ever submitted to the IHF for signature. The National Libertarian Party Committee ("NATCOM") or board of directors authorized IHF to deliver a product, namely rooms, speakers, exhibit space and entertainment in return for a fee of any profit above expenses generated by IHF.

2.f Until August 1987, the IHF reported directly to NATCOM. After August 1987, communication was with Honey Lanham, Chair of the oversight committee.

2.g Board of Directors, NLP.

2.h Board of Directors, NLP.

3. Fundraising Events and Dates

The IHF financed its "cost-of-doing business" operations by selling convention packages (i.e., meals, transportaion, entertainment, and event tickets bundled together), single event tickets, booth spaces, and advertising. The IHF also coordinated room and food arrangements.

4. Funding

4.a IHF earned monies from various services which it sold to attendees to the NLP convention. No funds were directly received by IHF from NLP or the Washington State Libertarian Party for convention services or

activities. Sales were made of convention packages, single event tickets, booth spaces and advertising. Any surplus after expenses were paid to the hotel, transportation suppliers, food caterers, etc. were retained by IHF with agreement of NATCOM to compensate IHF for its services.

4.b IHF had gross sales of $133,134 and total expenses of $111,119, for a surplus of $22,015.

4.c Of the five programs run by IHF to finance its operations, 40% of revenues were generated by the sale of convention packages to attendees, 10% from individual ticket sales to events, 40% from the sale of "Liberty Bucks" or coupons for social events and after convention time entertainment (e.g., boat cruise), 5% from the sale of booth space in the hotel, and 5% from sale of advertising space in publications printed for the Convention.

4.d IHF spent no funds for political fundraising events at the Convention. All political fundraising was conducted and financed by members of each Presidential candidates organizing committee at the Convention.

4.e Total expenses incurred by IHF for political fundraising events or activities = $0.00. Total expenses to provide rooms, booth space, advertising, etc. = $111,119.

4.f Total funds expended for each convention political fundraising event or activity = $0.00. Total expenses to provide rooms, booth space, advertising, etc. = percentages in 4.c among costs in 4.e.

5. How the Convention was funded

5.a Operations and facilities for the Convention were paid for by attendees who purchased "Liberty Bucks" or convention coupon packages, single event tickets. booth space, advertising, and event packages.

Funds to pay for political fundraising activities were paid after the Banquet by attendees directly to the organizing committees of each prospective Presidential candidate or directly to NLP. IHF is not aware of which group or groups actually received funds raised after the Banquet.

5.b Attendees paid for the costs of operating the facilities and organization of the Convention; Convention business meeting space was paid for by useage of guest rooms and meal functions.

Political fundraising by the NLP at the Convention Banquet was paid for by NLP and the organizing committees of prospective Presidential candidates.

5.c To the best knowledge of IHF, any political funds raised at the Convention were raised and dispersed by Presidential candidate committees. IHF has no information or knowledge of how NLP or the Presidential candidate committees may have used any such funds raised.

See IHF Summary of Operating Statement (2/02/87 - 12/31/87) unaudited, attached, which detail how operating and administrative funds were expended.

6. Transfer of Funds

6.a None

6.b N/A

6.c None

6.d N/A

Summary - We firmly believe that there is no reasonable or substantive evidence to find any violation by IHF of 2 U.S.C. Sec. 437, 11 C.F.R. Sec. 9008.1(b) [IHF was not representing NLP or LPWS], or 11 C.F.R. Sec. 9008.12 (b) [IHF was not established by NLP or LPWS]. These statutes and regulations apply only to convention organizing committes of political parties, state or local community hosting organizations, and voluntary citizens committes.

There is no basis or authority to apply the statutes or regulations to independent, private contractors who provide services for hire.

The Federal Election Commission should find that there is no reason to believe that any further action should be taken against IHF under its Federal mandate.

If you have any further questions, please contact me and I will make every effort to assist you in finding the appropriate information to resolve this matter.

Sincerely yours,

Robert O. Sailer

Robert O. Sailer

ROS:sm
cc: The Invisible Hand Foundation

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The Libertarian Party

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Ms. Mary Taksar
Federal Election Commission
999 E. St. NW
Washington, DC 20463

Dear Ms. Taksar,

Enclosed please find answers to the interrogatories from the FEC on MUR 3177.

If additional filings are necessary, or if you have any questions, please call me during business hours @ 703 478 5880.

Thank you.

Sincerly,

William Redpath

William Redpath
LP Treasurer

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MUR 3177: Responses to 14 June 1991 interrogatories.

1.a. State the relationship between the Libertarian National Committee and the Libertarian Party of Washington State.

The Libertarian Party of Washington State is a state party affiliate of the Libertarian National Committee.

The Libertarian Party of Washington State is an autonomous self-governing political association organized under the laws of the State of Washington.

The relationship between the Libertarian Party of Washington State and the Libertarian National Committee is governed by Article 7 of the Bylaws and Convention Rules of the Libertarian Party. See Attachment 1.

1.b. State the relationship between the Libertarian National Committee and LPWS Convention Services Group ("LPWS-CSG").

Upon information and belief, LPWS Convention Services Group is a corporation, formed under the laws of the State of Washington, to accept an assignment of an existing proposal to host a Libertarian National Convention to be held in Seattle, Washington, August 31 - September 6, 1987.

Upon information and belief, the incorporators of LPWS Convention Services Group are Ruth E. Bennett, David A. Jones and Bettina R. Carter. Ruth E. Bennett is a current member in the Libertarian Party, David A. Jones is a former member in the Libertarian Party, Bettina (Tina) R. Carter is a current member in the Libertarian Party.

The Libertarian National Committee is not and was not an incorporator, director or shareholder in LPWS Convention Services Group.

2.a. Identify the role of the Oversight Committee of the Libertarian National Committee for the 1987 Nominating Convention.

The Oversight Committee of the Libertarian National Committee was created by a resolution of the Libertarian National Committee dated 3 December 1983, which states:

> "CONVENTION OVERSIGHT COMMITTEE: A three-person Convention Oversight Committee is hereby created to consider goals and negotiate contracts, as needed, for future National Conventions and to report back to the LNC on adherence by convention operators to existing

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contracts."

Upon information and belief, the members of the Convention Oversight Committee operated within the limits of this authority.

2.b. Describe in detail the duties performed by the Oversight Committee.

With respect to the 1987 National Convention, the Convention Oversight Committee (1) considered the goals of the 1987 National Convention; (2) negotiated a contract between the Libertarian National Committee and LPWS-CSG; (3) attempted to reduce the contract between the Libertarian National Committee and LPWS-CSG to writing and have the same executed by both parties; and (4) reported back to the Libertarian National Committee on problems arising in the performance of the contract between the Libertarian National Committee and LPWS-CSG.

2.c. Describe the authority granted to this committee, including but not limited to, payment authorization.

The authority granted to the Libertarian National Committee's Convention Oversight Committee is fully set forth in response to Interrogatory 2.a.

The Libertarian National Committee's Convention Oversight Committee has never been granted payment authorization.

2.d. State whether the Libertarian National Committee had an arrangements committee.

No.

2.e. If so, identify the arrangements committee and detail the duties performed by the arrangements committee.

Not applicable.

3. Identify all fundraising events for the 1987 National Convention by providing the name of each event and the date on which each event was held.

Upon information and belief, there were only two sources of fundraising at the 1987 National Convention, and only one of these two sources is appropriately classified an event:

(1) Convention registration, through September 6, 1987.
(2) Presidential banquet, September 5, 1987.

4.a. State whether the Libertarian National Committee directly received funds or contributions for fundraising events or convention activities.

No.

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The Libertarian National Committee did not directly or indirectly receive funds or contributions for fundraising events or convention activities related to the 1987 Libertarian National Convention.

Subsequent to the 1987 Libertarian National Convention, the Libertarian National Committee agreed to pay LPWS-CSG the sum of $2,901.78 in settlement of claims LPWS-CSG asserted against the Libertarian National Committee for services provided in hosting the 1987 Libertarian National Convention. See attachment 2.

4.b. If so, state whether these funds were deposited into a depository.

Not applicable, see response to Interrogatory 4.a.

4.c. Identify the depository into which such funds were deposited.

Not applicable, see response to Interrogatory 4.a.

5.a. Identify total funds or contributions received by the Libertarian National Committee for convention fundraising events or activities.

None, see response to Interrogatory 4.a.

5.b. Identify total funds or contributions received by the Libertarian National Committee for <u>each</u> convention fundraising event or activity.

None, see response to Interrogatory 4.a.

6.a. State whether the Libertarian National Committee directly expended funds for fundraising events or convention activities.

Yes, see response to Interrogatory 4.a.

6.b. Identify total expenses incurred by the Libertarian National Committee for convention fundraising events or activities.

$2,901.78.

6.c. Identify total funds expended by the Libertarian National Committee for <u>each</u> convention fundraising event or activity.

See response to Interrogatory 4.a.

7.a. State whether the Libertarian National Committee transferred any funds to LPWS-CSG for the convention or for the preparation and planning of the convention and related activities.

No.

7.b. If so, identify the event, the date of the event, and the

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amount and date of any transfers.

Not applicable.

7.c. State whether LPWS-CSG transferred any funds or contributions received from convention fundraising events or activities to the Libertarian National Committee.

No.

7.d. If so, identify the event, the date of the event, and the amount and date of any transfers.

Not applicable, see response to Interrogatory 7.c.

8.a. State how the convention was funded.

Upon information and belief, the 1987 Libertarian National Convention was funded by LPWS-CSG and convention registration.

8.b. Identify who paid for the convention and the source of funds used to pay for each convention activity or fundraising event.

See response to Interrogatory 8.a.

8.c. Describe in detail how funds raised at convention fundraising events and activities were used.

Upon information and belief, funds raised at the Presidential Banquet were expended through and in the cause of the Presidential Campaign; funds raised by LPWS-CSG (see 8.a. above) were expended by LPWS-CSG in the cause of runnung the convention. Details regarding these expenditures are not available to Libertarian National Committee.

The Libertarian National Committee received no funds from convention fundraising events and activities.

9.a. State whether the Libertarian National Committee reported any contributions or funds received and expenditures made relating to the convention in its reports filed with the Federal Election Commission. ("Commission").

Expenditures related to paying the debt to LPWS-CSG incurred as a result of the 1987 Libertarian National Convention were duly reported as required.

See also 8.c. above.

9.b. If so, identify the contributions, funds, or expenditures relating to the convention which the Libertarian National Committee reported to the Commission.

Agreement as to amount owed occurred during the second half of

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1988. Amounts owed and expenditures made were reported on FEC FORM 3X for this and subsequent periods. Schedule D substantiation for line 10 during this period and subsequent periods are attached. See Attachment 3.

See also 8.c. above.

9.c. If no reporting was made regarding the convention, state why the Libertarian National Committee failed to report financial activity regarding the convention to the Commission pursuant to 2 U.S.C. § 437(2).

Upon information and belief, officers at the time of the convention believed they had fullfilled all reporting requirements.

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MUR 3177

Letter of 22 Jul 91

Attachment 1

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ATTACHMENT 1

Libertarian Party

BYLAWS AND CONVENTION RULES

Adopted in Convention

Philadelphia, Pennsylvania

September, 1989

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BYLAWS OF THE LIBERTARIAN PARTY

ARTICLE 1: NAME

These bylaws shall govern the association known as the "Libertarian Party," hereinafter referred to as the "Party."

ARTICLE 2: PERIOD OF DURATION

The duration of the Party shall be perpetual.

ARTICLE 3: PURPOSES

The Party is organized to implement and give voice to the principles embodied in the Statement of Principles by:

--functioning as a libertarian political entity separate and distinct from all other political parties or movements;

--chartering affiliate parties throughout the United States and promoting their growth and activities;

--nominating candidates for President and Vice-President of the United States, and supporting Party and affiliate party candidates for political office; and,

--entering into political information activities.

ARTICLE 4: STATEMENT OF PRINCIPLES AND PLATFORM

1. The Statement of Principles affirms that philosophy upon which the Libertarian Party is founded, by which it shall be sustained, and through which liberty shall prevail. The enduring importance of the Statement of Principles requires that it may be amended only by a vote of 7/8 of all registered delegates at a Regular Convention.

2. The Party Platform shall include, but not be limited to, the Statement of Principles and the implementation of those principles in the form of planks.

ARTICLE 5: LIBERTARIAN PARTY PROGRAM

1. The National Committee shall adopt and report the LP Program to the membership.

2. The Program recommendation by the National Committee shall be comprised of:

a. a maximum of 10 issues;

b. issues which are currently receiving widespread, national public attention;

c. issues which are readily identifiable by most individuals as matters which affect them personally and directly; and

d. interim or transitional proposals which move toward a libertarian society, which are clearly identified as interim or transitional proposals.

3. The National Committee shall appoint 3 or more individuals to submit draft program planks to the National Committee.

4. Motions to approve planks require a 2/3 vote of the entire National Committee.

5. No proposal shall conflict with the LP Platform.

ARTICLE 6: MEMBERSHIP

1. Members of the Party shall be those persons who have certified in writing that they oppose the initiation of force to achieve political or social goals.

2. Dues for membership in the Party shall be set by the National Committee.

3. Only members whose national dues are current shall be counted for delegate apportionment, and National Committee representation. Only members whose national dues are current shall be eligible to hold National Party offices or be a candidate for President or Vice President.

ARTICLE 7: AFFILIATE PARTIES

1. No person, group or organization may use the name "Libertarian Party" or any confusingly similar designation except an organization to which the Party grants affiliate party status.

2. The National Committee shall charter affiliate parties from any qualifying organization requesting such status in each state, territory and the District of Columbia (hereinafter, state). Organizations which wish to become affiliate parties shall apply for such status on a standard petition form as adopted by the National Committee, which petition shall be signed by no fewer than ten members of the Party residing in the appropriate state. Affiliate party status shall be granted only to those organizations which adopt the Statement of Principles and file a copy of their Constitution and/or Bylaws with the Party Secretary.

3. There shall be no more than one affiliate party in any one state, and the affiliate party shall determine who shall be its delegates to all Regular Conventions.

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4. No affiliate party shall endorse any candidate who is a member of another party for public office in any partisan election. No affiliate party shall take any action inconsistent with the Statement of Principles or these Bylaws.

5. The autonomy of the affiliate parties shall not be abridged by the National Committee or any other committee of the Party, except as provided by these Bylaws.

6. The National Committee shall have the power to revoke the status of any affiliate party, for cause, by a vote of 3/4 of the entire National Committee. The affiliate party may challenge the revocation of its status by written appeal to the Judicial Committee within 30 days of receipt of notice of such revocation. Failure to appeal within 30 days shall confirm the revocation and bar any later challenge or appeal. The National Committee shall not revoke the status of any affiliate party within six months prior to a Regular Convention.

The Judicial Committee shall set a date for hearing the appeal within 20 to 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and submit evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's revocation of affiliate party status or order reinstatement of the affiliate party. The Judicial Committee shall issue its ruling within 30 days of the hearing and in no case later than 90 days prior to a Regular Convention. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's revocation of affiliate party status except when the last day of the 30 day period falls within 90 days prior to a Regular Convention, in which case the Judicial Committee's non-action shall result in reinstatement of affiliate party status.

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ARTICLE 8: OFFICERS

1. The officers of the Party shall be:

-- Chair,
-- Vice-Chair,
-- Secretary, and
-- Treasurer.

All of these officers shall be elected by a Regular Convention of the Party, shall take office immediately upon the close of the Convention and shall serve thereafter until the final adjournment of the next Regular Convention. No person shall serve as an officer who is not a member of the Party.

2. No offices shall be combined.

3. The officers shall be full voting members of the National Committee.

4. The Chair shall preside at all Conventions and all meetings of the

National Committee. The Chair is the chief executive officer of the Party with full authority to direct its business and affairs, including hiring and discharging of National Committee volunteers and paid personnel, subject to express National Committee policies and directives issued in the exercise of the National Committee's plenary control and management of Party affairs, properties and funds.

5. The Vice-Chair shall be the chief assistant to the Chair, performing such duties as the Chair shall prescribe, and holding such executive powers as the Chair shall delegate and shall perform the duties of the Chair in the event that the Chair is, for any reason, unable to perform the duties of the office.

6. The Secretary shall be the recording officer of the Party and shall perform such duties as are assigned by the Chair or the National Committee. The Secretary shall attend all meetings of the National Committee and all Party Conventions and shall act as Secretary thereof, keeping such minutes and records as necessary. The Secretary shall make an annual report to the National Committee containing all information required by the Committee.

7. The Treasurer shall receive, expend and account for the funds of the Party under the supervision and direction of the Chair and the National Committee. The Treasurer shall make an annual financial report to the National Committee and shall perform all duties required of the office by applicable federal and state law.

8. The National Committee may, for cause, suspend any officer by a vote of 2/3 of the entire National Committee. The suspended officer may challenge the suspension by an appeal in writing to the Judicial Committee within seven days of receipt of notice of suspension. Failure to appeal within seven days shall confirm the suspension and bar any later challenge or appeal.

The Judicial Committee shall set a date for hearing the appeal between 20 and 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and present evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's suspension of the officer or order the officer's reinstatement within 30 days of the hearing. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's suspension of the officer. At such time as the suspension is final, the office in question shall be deemed vacant.

9. The National Committee shall appoint new officers if vacancies occur, such officers to complete the term of the office vacated.

ARTICLE 9: NATIONAL COMMITTEE

1. The National Committee shall have control and management of all the affairs, properties and funds of the Party consistent with these Bylaws. The Libertarian National Committee shall establish and oversee an organizational structure to implement the purposes of the

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Party as stated in Article 3. The National Committee shall adopt rules of procedure for the conduct of its meetings and the carrying out of its duties and responsibilities. The National Committee may delegate its authority in any manner it deems necessary.

2. The National Committee shall be composed of the following members:

a. the officers of the Party;

b. five members elected at large by the delegates at a Regular Convention; and

c. any additional members as specified below:

Any affiliate party with 10% or more of the total national party membership (as determined for delegate allocation) shall be entitled to one National Committee representative and one alternate for each 10% of national membership.

Affiliate parties may, by mutual consent, band together to form "representative regions," and each such "region" with an aggregate national party membership of 10% or more shall be entitled to one National Committee representative and one alternate for each 10% of national party membership.

"Representative regions" may be formed or dissolved once every two years during a period beginning 90 days before the beginning of and ending on the second day of the National Convention, and notice of new formations or dissolutions must be given in writing to the national Secretary prior to the close of the Convention at which they take place.

3. The National Committee shall take office immediately upon the close of the Regular Convention at which they are selected, and serve until the final adjournment of the next Regular Convention.

4. A National Committee member shall be a member of the Party, and shall not be the candidate of any party except the Party or an affiliate.

5. The National Committee may, for cause, suspend any member-at-large by a vote of 2/3 of the entire National Committee. The suspended member-at-large may challenge the suspension by an appeal in writing to the Judicial Committee within seven days of receipt of notice of suspension. Failure to appeal within seven days shall confirm the suspension and bar any later challenge or appeal.

The Judicial Committee shall set a date for hearing the appeal between 20 and 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and present evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's suspension of the member-at-large or order reinstatement of the member-at-large within 30 days of the hearing. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's suspension

of the member-at-large. At such times as the suspension is final, the office in question shall be deemed vacant.

6. The National Committee shall appoint new officers and members-at-large if vacancies occur, such officers and members-at-large to complete the term of the office vacated.

7. A National Committee Regional Representative may be removed and replaced only by the act of the affiliate parties which constitute the subject region. The voting procedure for the removal and replacement of regional representatives shall be determined by the regions. In the absence of any such procedures, a majority vote of the state chairs shall prevail.

8. The National Committee shall meet at such times and places as may be determined by:

-- action of the Committee,
-- call of the Chair, or
-- written request of 1/3 or more of its members.

9. The National Committee may, without meeting together, transact business by mail. The Secretary shall send out mail ballots on any question submitted by the Chair or by at least 1/5 of the members of the Committee. Fifteen days shall be allowed for the return of the votes cast, by mail, to the Secretary. The Secretary shall establish procedures for identifying voters in a mail ballot, and may accept votes through any mail system, including facsimile and electronic mail, for which such procedures have been established. Votes from alternate regional representatives will be counted, in accordance with the ranking procedure of the region, only if the regional representative fails to respond to the ballot. If, at the expiration of the applicable period, a quorum of the Committee have not returned their votes, the measure being voted upon shall be deemed to have failed; in all other cases, a majority of the votes returned shall carry the measure, except where a higher vote is required by the Bylaws. The Secretary shall preserve all such votes until the next meeting of the National Committee, at which meeting the Committee shall order the disposition of such votes.

10. A majority of the membership of the National Committee shall constitute a quorum for the transaction of business at all meetings.

11. Upon appeal by 5% of the Party members, the Judicial Committee shall consider the question of whether or not a decision of the National Committee contravenes specified sections of the Bylaws. If the decision is vetoed by the Judicial Committee, it shall be declared null and void.

ARTICLE 10: JUDICIAL COMMITTEE

1. The Judicial Committee shall be composed of seven Party members elected at each Regular Convention, and any five members shall constitute a quorum. No member of the National Committee may be a member of the Judicial Committee. The members of the Judicial

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Committee shall select the Chair of the Judicial Committee. The Judicial Committee shall take office immediately upon the close of the Regular Convention at which elected and shall serve until the final adjournment of the next Regular Convention.

2. The subject matter jurisdiction of the Judicial Committee is limited to consideration of only those matters expressly identified as follows:

a. suspension of affiliate parties (Article 7, Section 6),

b. suspension of officers (Article 8, Section 8),

c. suspension of National Committee members-at-large (Article 9, Section 5),

d. voiding of National Committee decisions (Article 9, Section 11),

e. challenges to platform planks (Rule 7, Section 7),

f. challenges to Resolutions (Rule 8, Section 2), and

g. suspension of Presidential and Vice-Presidential candidates (Article 13, Section 5).

3. Within 90 days following the Regular Convention at which elected, the Judicial Committee shall establish Rules of Appellate Procedure to govern its consideration of matters within the scope of its jurisdiction. The existing Rules shall remain in effect until and unless the Judicial Committee submits new proposed rules to the National Committee for approval, which approval shall be deemed given unless denied by a 2/3 vote of the National Committee within 60 days of submission. A copy of the current Rules of Appellate Procedure shall be maintained by the Secretary at the Party Headquarters and shall be available to any member at cost.

ARTICLE 11: FINANCE AND ACCOUNTING

1. The fiscal term of the Party shall begin on January 1 of each year. From January 1 until the National Committee has approved a budget, the Treasurer may authorize expenditures for any item incorporated in the previous year's budget as long as the level of expenditure is consistent with that budget.

2. The National Committee shall cause an efficient double-entry system of accounts to be installed and maintained.

3. All disbursements exceeding $20.00 shall be made solely by check.

4. The National Committee shall have the power to designate the depository of all funds of the Party, and shall appoint such officers and employees as in its judgment may seem advisable to deposit and withdraw funds.

5. The Party shall not borrow in excess of $2,000 total without prior

approval by 2/3 vote of the National Committee. This shall not include current operating debt for trade payables.

ARTICLE 12: CONVENTIONS

1. Regular Conventions:

The Party shall hold a Regular Convention every two years, at a time and place selected by the National Committee. Regular Conventions shall be held sometime during the period of July of an odd-numbered year through June of an even-numbered year. All business required to be conducted at Regular Conventions shall be conducted at Regular Conventions only.

2. Non-Regular Conventions:

In any year which does not include a Regular Convention, a non-regular convention may be held at the discretion of the National Committee.

3. Delegates:

a. Delegates shall be required to be members of either the Party or an affiliate party. At all Regular Conventions delegates shall be those so accredited who have registered at the Convention. At all Non-Regular Conventions, any person who wishes to attend may do so.

b. Any federal or state law to the contrary notwithstanding, delegates to a Regular Convention shall be selected by a method adopted by each affiliate party; provided however, that only members of the Party as defined in these Bylaws, or members of the affiliate party as defined in the constitution or bylaws of such affiliate party, or those who have made the certification required by Article 6 of these Bylaws, shall be eligible to vote for the selection of delegates to a Regular Convention.

4. Affiliate Party Delegate Entitlements:

Each affiliate party shall be entitled to send delegates to each Regular Convention on the following basis:

a. one delegate for each 20 members or fraction thereof, of the National Party (at least one such delegate must be a resident of that state); plus

b. one additional delegate for each one percent (1%) (rounded) of the total vote cast for President in that state or district which was received by the Party's most recent candidate for President.

5. Ex-Officio Delegates:

In addition, the following persons shall be ex-officio delegates, automatically entitled to delegate status:

a. National Officers;

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b. National Committee members or their alternates;

c. all former Party nominees for the Presidency and Vice-Presidency of the United States; and

d. each state governor, U.S. Representative and U.S. Senator who is a Party member and not affiliated with any other party.

6. Delegate Allocation:

In order to be counted for delegate allocation, membership applications must be sent to the National Headquarters by either the individual member or the affiliate party and received or postmarked no later than the last day of the seventh month prior to the Regular Convention. The Secretary shall make a count of the members qualified under the requirements set forth here and shall compute the delegate allocations for the affiliate parties. Notification of the membership totals and allocation totals shall be sent by the Secretary to the Chair of each affiliate party no later than the last day of the fifth month prior to a Regular Convention.

A list of the names and addresses of all delegates and alternates chosen by each affiliate party shall be sent to the Secretary no later than one month prior to start of the first general session of the Regular Convention. Amendments to such lists may be made by the affiliate parties until the close of the Credentials Committee meeting preceding the Convention. The number of alternates' names submitted shall not exceed the greater of 50 or the number of delegates allocated. Failure to submit a listing of delegate/alternate names and addresses, as prescribed within these Bylaws, shall cause no delegation to be registered from that affiliate party.

7. Delegate List:

Any Party member shall be provided, upon request and payment of copying and mailing costs, a list of the names and addresses of all elected delegates/alternates to a Convention.

8. Convention Committees:

There shall be a Platform Committee, a Bylaws and Rules Committee and a Credentials Committee for each Regular Convention. The National Committee shall appoint a temporary chair of each committee to serve until each committee selects its own chair.

a. The Bylaws and Rules Committee shall consist of ten Party members appointed by the National Committee no later than three months before a Regular Convention. No more than five of these members shall be members of the current National Committee.

b. The Platform Committee shall consist of 20 members selected as follows:

--One member by each of the ten affiliate parties having the largest memberships as determined for Convention delegate allocations. These shall be selected by each of the affiliate parties no later than one

month prior to the Regular Convention.

--Ten members appointed by the National Committee, including no less than five members from states other than the ten having the largest Party memberships. These members shall be appointed no later than three months prior to the Regular Convention.

c. The Credentials Committee, composed of ten members, shall be selected as follows:

--Five members chosen by the National Committee.

--One member by each of the five affiliate parties having the largest memberships as determined for Convention delegate allocations. These shall be selected by each of the affiliate parties no later than one month prior to the Regular Convention.

d. Ranked alternates may be named by the appointing bodies to fill any vacancies in the Convention Committees.

9. Quorum:

A quorum shall consist of 40% of the total number of delegates registered in attendance at the Convention.

10. Convention Rules:

Conventions of the Party shall be conducted in accordance with the current Bylaws and Convention Rules, unless otherwise amended at a Regular Convention.

ARTICLE 13: PRESIDENTIAL AND VICE-PRESIDENTIAL CAMPAIGNS

1. Nominations of candidates for President and Vice-President of the United States may be made only at the Regular Convention immediately preceding a Presidential election.

2. No candidate may be nominated for President or Vice-President who is ineligible under the United States Constitution, who has not expressed a willingness to accept the nomination of the Party, or who is not a member of the Party.

3. In the event of the death, resignation, disqualification or suspension of the nomination of the Party's nominee for President, the Vice-Presidential nominee shall become the Presidential nominee. Two-thirds of the entire membership of the National Committee may, at a meeting, fill a Vice-Presidential vacancy, and, if necessary, a simultaneous Presidential vacancy.

4. The National Committee shall respect the vote of the delegates at Nominating Conventions and provide full support for all nominees for President and Vice-President as long as their campaigns are conducted in accordance with the Platform of the Party.

5 A candidate's nomination may be suspended by a 3/4 vote of the

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entire membership of the National Committee at a meeting. That candidate's nomination shall then be declared null and void unless the suspended candidate appeals the suspension to the Judicial Committee within seven days of receipt of notification of suspension. The resolution of suspension must state the specific reasons for suspension and must be signed by each member of the National Committee agreeing thereto. The Judicial Committee shall meet and act on this appeal within 30 days and before the election.

ARTICLE 14: PARLIAMENTARY AUTHORITY

The rules contained in the current edition of Robert's Rules of Order, Newly Revised shall govern the Party in all cases to which they are applicable and in which they are not inconsistent with other rules adopted by the Party.

ARTICLE 15: AMENDMENT

1. These Bylaws may be amended by a 2/3 vote of the delegates at any Regular Convention.

2. Article 4, Section 1, shall not be amended by a vote of less than 7/8 of all registered delegates at a Regular Convention.

ARTICLE 16: PROMULGATION OF BYLAWS

The National Committee shall promulgate the Bylaws in accordance with applicable law. A copy of these Bylaws and Convention Rules shall be provided to each member of the National Committee, each member of the Judicial Committee and each Chair of an affiliate party within 90 days of adoption.

CONVENTION RULES OF THE LIBERTARIAN PARTY

RULE 1: ORDER OF BUSINESS

The standing order of business for a Regular Convention shall be as follows:

1. Call to order
2. Credentials Committee report
3. Adoption of agenda
4. Treasurer's report
5. Bylaws and Rules Committee report (Non-nominating conventions only)
6. Platform Committee report (At non-Presidential nominating conventions only deletions may be considered.)
7. Nomination of Party candidates for President and Vice-President (in appropriate years)
8. Election of Party Officers and at-large members of the National Committee
9. Election of Judicial Committee
10. Resolutions
11. Other business

RULE 2: VOTING ELIGIBILITY

1. The Secretary, acting on behalf of the Credentials Committee, shall report the number of delegates registered in attendance and eligible to vote directly after the opening of the first business session, and at the beginning of each succeeding session.

2. All delegates shall be eligible to vote on all matters. In order to vote on a given matter, a delegate must be present on the floor at the time the vote is taken. Each delegate present shall have one vote. Use of the unit rule or unit voting is prohibited at national conventions.

3. Duly selected alternates may be freely substituted for any members of their delegation, except for ex-officio delegates, who are temporarily or permanently absent from the floor, provided the procedure has been clearly specified by the affiliate party in advance of the Convention, and the Secretary has been provided with lists of the affiliate party's delegates and alternates as well as a copy of the affiliate party's rules governing substitutions.

4. An alternate, upon certification by the Secretary, may function as

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a delegate whenever a delegate of the same state has not been registered in attendance. This status shall continue until the absent delegate registers in attendance. If the affiliate party has made no provision for filling delegate vacancies, the alternate substitute shall be decided by drawing lots.

5. If the affiliate party has made no other provision, an alternate may temporarily vote in place of a delegate from the same state while he or she has the written consent of that delegate; however, no delegate may cast more than one vote on a question.

6. All members must wear the identification badge issued upon registration in order to be admitted to the Convention hall.

RULE 3: VOTING PROCEDURE AND MOTIONS

1. On all matters, except the election of Party Officers and at-large members of the National Committee, and the nomination of Presidential and Vice-Presidential candidates, voting will be by voice vote. If ten or more delegates object to the Chair's ruling on the outcome of a voice vote, a counted vote will be held.

2. The Chair may require any motion offered from the Convention floor to be in writing, signed by the mover and submitted to the Secretary.

RULE 4: POLLING PROCEDURE

1. The State Chair shall serve as chair of his or her delegation, unless that delegation selects another of its members to serve as its chair and so notifies the Secretary.

2. In cases where a roll call vote is required, polling shall be by state. The Secretary will ask for the vote from each state in alphabetical order, and the chair of each delegation shall report the vote for that state. The Convention seating will be by state delegation. If someone challenges the vote reported by any state's chair, the Secretary shall poll the delegates from that state individually.

RULE 5: COMMITTEE PROCEDURES

1. A majority vote of those Committee members present is necessary for a "do pass" recommendation, and in the case of the Platform Committee, a majority must approve each specific plank separately.

2. Four or more members of the Platform Committee may join together to issue a minority report regarding any plank reported to the floor of the Convention. Two or more members of the Bylaws and Rules Committee or of the Credentials Committee may join together to issue a minority report regarding their business.

3. A member must be present in Committee to vote.

4. More than 1/2 of the membership of each committee shall constitute a quorum.

RULE 6: DEBATING AND VOTING -- BYLAWS AND RULES

The Chair of the Bylaws and Rules Committee shall report each recommendation of the Committee to the Convention separately and may explain the intent or purpose of the proposed amendment(s). The Convention Chair shall open each recommendation to discussion and amendment from the floor. Each recommendation shall be considered and adopted separately, with a maximum of ten minutes discussion on any recommendation.

RULE 7: DEBATING AND VOTING -- PLATFORM

1. The current Platform shall serve as the basis of all future platforms. At Regular Conventions, the existing Platform may be amended. Additional planks, or additions to planks, must be approved by 2/3 vote. A platform plank may be deleted by majority vote.

2. The Platform Committee shall meet before each Regular Convention and prepare a report containing its recommendations. At the convention, the Platform Committee's recommendations shall be reported to the floor and debated and voted upon separately. The Platform Committee shall set forth the order in which each recommendation shall be considered.

3. Recommendations for which there is no minority report shall be debated and voted upon in the following manner:

a. The Platform Committee Chair, or some other person designated by him or her, shall read the proposed recommendation and shall have up to two minutes to explain the recommendation.

b. The Convention Chair shall then open the recommendation to discussion and amendment for a period of 15 minutes. At the end of 15 minutes, a vote will be taken on whether to bring the recommendation (as amended, if this is the case) to a final vote. If a majority vote is in favor of immediate consideration, the vote to accept or reject the recommendation must follow immediately. If a majority vote is against immediate consideration, the proposed recommendation shall be tabled for later consideration after all other recommendations receiving a favorable majority vote from the Platform Committee have been considered.

4. Recommendations for which there is a minority report shall be debated and voted upon in the following manner:

a. Spokespersons for both the majority and minority positions shall each have two minutes to present their views.

b. The Chair shall then open consideration of both positions for five minutes during which time any delegates may express their views without offering amendments. After five minutes, there will be a vote

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on which of the two reports shall be considered for purposes of adopting a recommendation. The report receiving the greater number of votes shall then be discussed and voted upon in the manner described in Section 3b.

5. After all Committee recommendations have received initial consideration, any delegate may propose amendments to the Platform. The delegate may take up to two minutes to state and explain the proposal, with debating and voting to proceed as described in Section 3b.

6. Finally, if time permits, proposals which were considered by the Platform Committee but which received an unfavorable vote from a majority of the Committee, may be considered, with a spokesperson for the minority position giving the reasons in favor and the Platform Committee Chair or other representative of the majority position giving the reasons why it was voted down, before the proposal is taken to the floor for debate.

7. Challenges of adopted Party planks believed by 10% of the delegates to be in conflict with the Statement of Principles shall be referred in writing, during the Convention, to the Judicial Committee by the delegates requesting action for consideration. The challenge shall specify in what manner the plank is believed to be in conflict. The Judicial Committee shall consider the challenge, decide whether the Statement of Principles is conformed to and report their findings and reasons to the Convention. If the plank is vetoed by the Judicial Committee, it will be declared null and void but can be reinstated by a 3/4 vote of the Convention.

RULE 8: RESOLUTIONS

1. Resolutions must be approved by a 2/3 vote.

2. Resolutions must not be in conflict with the Statement of Principles. Challenges of such adopted Resolutions believed by 10% of the delegates to be in conflict with the Statement of Principles shall be referred in writing, during the Convention, to the Judicial Committee by the delegates requesting action for consideration. The challenge shall specify in what manner the Resolution is believed to be in conflict. The Judicial Committee shall consider the challenge, decide whether the Statement of Principles is conformed to, and report their findings and reasons to the Convention. If the Resolution is vetoed by the Judicial Committee, it will be declared null and void but can be reinstated by a 3/4 vote of the Convention.

RULE 9: NOMINATION OF PRESIDENTIAL AND VICE-PRESIDENTIAL CANDIDATES

1. Presidential and Vice-Presidential nominations shall be from the floor. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all the delegations have submitted their votes, the Secretary shall declare the voting closed. At this point, an announcement of each

delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

2. The Party's nominee for President shall be chosen by majority vote. If, after two ballots, no candidate has attained a majority, the candidate with the fewest votes on the latest ballot shall be struck from subsequent ballots. This procedure shall be repeated after every subsequent ballot in which no candidate has received a majority vote, until one candidate attains a majority.

3. The Party's nominee for Vice-President shall be chosen by the same procedure as for the Presidential nominee except that the Presidential nominee shall have the privilege of addressing the Convention for 5 minutes, after nominations have been made but before voting has begun, for the purpose of endorsing or objecting to any of the Vice-Presidential nominees.

4. Nominating and seconding speeches shall be limited in duration as follows:

President: Total of 16 minutes;

Vice-President: Total of 11 minutes.

RULE 10: ELECTION OF OFFICERS AND NATIONAL COMMITTEE

1. Nominations for Party Officers shall be from the floor, with any national or affiliate party member eligible to run for any office. The election shall be conducted in the following manner:

a. For each office, a majority vote will be necessary for election.

b. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all delegations have submitted their votes, the Secretary shall declare the voting closed.

c. At this point, an announcement of each delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

d. In cases where no candidate receives a majority, runoff votes will be held, dropping the candidate with the fewest votes after each ballot.

2. Nominations for the at-large members of the National Committee shall be from the floor, with all national or affiliate party members eligible for nomination. The election shall be conducted in the following manner:

a. Each delegate may cast up to five votes, but no more than one vote for any one candidate.

b. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all

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delegations have submitted their votes, the Secretary shall declare the voting closed.

c. At this point, an announcement of each delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

d. Those five candidates receiving the highest vote totals shall be declared elected. If a tie vote affecting the outcome of the election occurs, another ballot for the remaining offices shall be held with each delegate allowed to cast as many votes as there are offices to fill.

3. Nominations and elections for members of the Judicial Committee shall be conducted in the same manner as specified for at-large members of the National Committee.

4. Nominations for each candidate may be made by any delegate present on the floor, provided he or she has the candidate's permission. Nominating speeches shall be limited in duration as follows:

a. Chair: one five-minute nominating speech, two three-minute seconding speeches;

b. All others: one two-minute nominating speech, two one-minute seconding speeches..

5. In the event a region has not otherwise provided for the election of its regional representative to the National Committee then the delegates from the region shall elect its regional representative, provided there are at least five delegates present. Each Region's delegates may elect their representative in whatever manner they choose, provided all delegates present from that region are given equal voice in the selection.

RULE 11: NONE OF THE ABOVE

Votes cast for "None of the Above" in voting on the Party's nominees for President and Vice-President, the Party Officers, and at-large members of the National Committee, shall be considered valid. Should a majority of the votes be cast for "None of the Above" in the Presidential or Vice-Presidential balloting, no candidate shall be nominated for that office. Should "None of the Above" be selected for any Party office, that position shall be declared vacant and none of the losing candidates for that position may be selected to fill the vacancy for that term of office.

RULE 12: AMENDMENTS TO THE RULES

The Convention Rules may be amended by a 2/3 vote at a Regular Convention.

MUR 3177

Letter of 22 Jul 91

Attachment 2

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WARNER, NORCROSS & JUDD

ATTORNEYS AT LAW

900 OLD KENT BUILDING
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CONRAD A. BRADSHAW
HAROLD F. SCHUMACHER
CHARLES C. LUNDSTROM
THOMAS R. WINQUIST
PAUL K. GASTON
GEORGE L. WHITFIELD
WALLSON G. KNACK
CHARLES E. McCALLUM
JEROME M. SMITH
JOHN D. TULLY
R. MALCOLM CUMMING
WILLIAM K. HOLMES
ROGER M. CLARK
EDWARD MALINZAK
JOHN H. LOGIE
DONALD J. VELDMAN
JACK B. COMBS
JOSEPH F. MARTIN
THOMAS J. McNAMARA
JAMES H. BREAY
ROBERT H. SHILTON III
ERNEST M. SHARPE
VERNON P. BAPER
HUGH H. MAKENS
JOSEPH H. SWEENEY
GORDON R. LEWIS
ROBERT J. CHOVANEC
PETER L. GUSTAFSON
ROGER H. OETTING
J. A. CRAGWALL, JR.
STEPHEN R. KRETSCHMAN
W. MICHAEL VAN HAREN
JON P. BACHELDER
RICHARD A. DURELL
MICHAEL L. ROBINSON
JOSEPH G. SCOVILLE
EUGENE E. SMARY
DOUGLAS E. WAGNER
ROBERT W. SIKKEL
THOMAS H. THORNHILL
JEFFREY O. BIRKHOLD
BLAKE W. KRUEGER
JOHN G. CAMERON, JR.
JOHN H. McKENDRY, JR.
PAUL T. SORENSEN
CARL W. DUPENDACH
JAMES F. BOSSENBROEK
STEPHEN C. WATERBURY
PATRICK E. MEARS
RODNEY D. MARTIN
RICHARD E. CASSARD
STEVEN J. VANDER ARK
ALEX J. DeYONKER
RICHARD L. BOUMA
JOHN D. DUNN
WILLIAM W. HALL
STEPHEN P. CLIFTON
BRUCE C. YOUNG
SHANE B. HANSEN
F. WILLIAM McKEE
LOUIS C. RABAUT
DOUGLAS A. DOZEMAN
JOHN V. BYL
JANET P. KNAUS
KATHLEEN M. HANENBURG
MARK J. HENDERSON
TRACY T. LARSEN
SUE G. CONWAY
SHEILA C. McCARTHY
STEVEN R. HEACOCK
CAMERON B. DeLONG
WILLIAM J. BARRETT
JEFFREY S. POWER
SCOTT D. HUBBARD
AMY S. KLEMM
MARY LOU HOWARD
STEPHEN S. GROW
M. GAYLE ROBINSON
MICHAEL A. WEDDELL
BRIDGET C. KEHOE

OF COUNSEL
CONRAD E. THORNQUIST
LAWSON E. BECKER
LEONARD D. VERDIER, JR.
PHIL R. JOHNSON

DAVID A. WARNER
1903-1984

GEORGE B. NORCROSS
1909-1980

SIEGEL W. JUDD
1909-1982

January 12, 1988

Ms. Ruth Bennett
43 Broadway, No. 2
Tacoma, Washington 98402

Re: Convention Services Group

Dear Ms. Bennett:

This letter is written as a follow-up to the resolution of the NATCOM concerning settlement of the dispute between the Libertarian Party and Convention Services Group over provision of services at the 1987 Libertarian National Convention. As you are no doubt aware, the NATCOM approved the settlement worked out between you and the special committee appointed to meet with you on the following terms and conditions:

1. The LP would pay to CSG the sum of $2,901.78, allocable as follows:

Media Services (including June national media mailing, national media mailing of platform, tabloid mailing (750), telephone follow-up costs, Seattle area media/press contacts, convention follow-up mailing and wire services costs)	$2,000.00
Printing Rules and Bylaws Reports	132.71
Printing Platform Reports	373.01
National Media List Mailing	66.06
Secretarial Services	330.00

2. Such payment is contingent upon receiving the following:

(a) Documentation (i.e., paid invoices, receipts, cancelled checks or other written evidence of payment) of the listed items;

(b) Complete copies of CSG media list and convention attendee list; and

(c) A release of the LP from any further liability for convention services provided.

If you have any questions concerning what sort of documentation might suffice, feel free to contact me so we can discuss the matter. My reading of the NATCOM's resolution is simply that the NATCOM be able to demonstrate to the LP membership that funds were spent for services which were actually performed. At the NATCOM meeting, a breakdown of certain costs was provided, but none of the supporting documentation was made available.

I have enclosed a simple form of release which I would propose be executed by Convention Services Group as part of the settlement. Please let me know if you believe any changes should be made to it. I look forward to hearing from you.

Very truly yours,

William W. Hall

klr

Enclosure

bcc: Mr. James Turney
Mr. Paul Jacob
Mr. Don Ernsberger

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RELEASE

In consideration of the sum of Two Thousand Nine Hundred One and 78/100 Dollars ($2,901.78), the receipt of which is hereby acknowledged, Convention Services Group hereby releases the Libertarian Party, its members, officers, employees and national committee representatives from all liability which may have arisen by reason of the provision of services by Convention Services Group to the Libertarian Party or its national committee in connection with the 1987 Libertarian Party National Convention held in Seattle, Washington.

DATED: _____, 1988 CONVENTION SERVICES GROUP

By_____

Its_____

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MUR 3177

Letter of 22 Jul 91

Attachment 3

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7/1/88 thru 9/30/88

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Libertarian National Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Internal Revenue Service Philadelphia, PA 19255-0005	2,195.40	7,621.71	8,020.07	1,797.04
Nature of Debt (Purpose): Employment taxes				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Progressive Marketing 3200 Polk Houston, TX 77003	2,690.50	0.00	500.00	2,190.50
Nature of Debt (Purpose): Printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Liberty Services c/o Craig Franklin 3930 Freedom Circle Santa Clara, CA 95054	2,750.00	0.00	0.00	2,750.00
Nature of Debt (Purpose): Computer services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Convention Services Group c/o Ruth Bennett 43 Broadway #2 Tacoma, WA 98402	0.00	2,901.78	901.78	2,000.00
Nature of Debt (Purpose): Convention services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor MCI Telecommunications Drawer 99420 Ft. Worth, TX 76199-0402	0.00	2,220.58	1,712.91	507.67
Nature of Debt (Purpose): Telephone services				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Lysander, Inc. P. O. Box 137 Kearneysville, WV 25430	0.00	9,301.34	6,301.34	3,000.00
Nature of Debt (Purpose): Publishing L P News				

1) SUBTOTALS This Period This Page (optional)	12,245.21
2) TOTAL This Period (last page this line only)	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedule for each numbered line)

Name of Committee (In Full) Libertarian National Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Internal Revenue Service Philadelphia, PA 19255-0005	1,797.04	4,264.95	4,503.04	1,558.95
Nature of Debt (Purpose): Employment taxes				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Progressive Marketing 3200 Polk Houston, TX 77003	2,190.50	-0-	-0-	2,190.50
Nature of Debt (Purpose): Printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Liberty Services c/o Craig Franklin 3930 Freedom Circle Santa Clara, CA 95054	2,750.00	-0-	-0-	2,750.00
Nature of Debt (Purpose): Computer services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Convention Services Group c/o Ruth Bennett 43 Broadway #2 Tacoma, WA 98402	2,000.00	-0-	100.00	1,900.00
Nature of Debt (Purpose): Convention services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor MCI Telecommunications Drawer 99420 Ft. Worth, TX 76199-0402	507.67	1,335.52	1,314.74	528.45
Nature of Debt (Purpose): Telephone services				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Lysander, Inc. P. O. Box 137 Kearneysville, WV 25430	3,000.00	4,500.00	7,500.00	-0-
Nature of Debt (Purpose): Publishing L P News				
1) SUBTOTALS This Period This Page (optional)				8,927.90
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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SCHEDULE D
Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER 10
(Use separate schedule for each numbered line)

Name of Committee (In Full) Libertarian National Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Internal Revenue Service Philadelphia, PA 19255-0005	1,555.95	2,461.82	2,461.82	1,558.95
Nature of Debt (Purpose): Employment taxes				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Progressive Marketing 3200 Polk Houston, TX 77003	2,190.50	0.00	500.00	1,690.50
Nature of Debt (Purpose): Printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Liberty Services c/o Craig Franklin 3930 Freedom Circle Santa Clara, CA 95054	2,750.00	0.00	0.00	2,750.00
Nature of Debt (Purpose): Computer services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Convention Services Group c/o Ruth Bennett 43 Broadway #2 Tacoma, WA 98402	1,900.00	0.00	0.00	1,900.00
Nature of Debt (Purpose): Convention services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor MCI Telecommunications Drawer 99420 Ft. Worth, TX 76199-0402	528.45	721.19	1,249.64	0.00
Nature of Debt (Purpose): Telephone services				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Printing & Graphics 8086 Sudley Road Manassas, VA 22110	2,813.43	1,666.78	1,949.26	2,530.95
Nature of Debt (Purpose): Printing				

1) SUBTOTALS This Period This Page (optional)	10,430.40
2) TOTAL This Period (last page this line only)	
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	

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1/1/89 THRU 9/30/89

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full) Libertarian National Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Internal Revenue Service Philadelphia, PA 19255-0005	1,558.95	7,717.56	8,521.92	754.59
Nature of Debt (Purpose): Employment Taxes				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Progressive Marketing 3200 Polk Houston, TX 77003	1,690.50	-0-	1,690.50	-0-
Nature of Debt (Purpose): Printing				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Liberty Services c/o Craig Franklin 3930 Freedom Cir. Santa Clara, CA 95054	2,750.00	-0-	-0-	2,750.00
Nature of Debt (Purpose): Computer Services				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Convention Services Group c/o Ruth Bennett 43 Broadway #2 Tacoma, WA 98402	1,900.00	-0-	1,900.00	-0-
Nature of Debt (Purpose): Convention Services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Printing & Graphics 8086 Sudley Rd. Manassas, Va 22110	2,530.95	6,776.99	9,307.94	-0-
Nature of Debt (Purpose): Printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				

1) SUBTOTALS This Period This Page (optional)	
2) TOTAL This Period (last page this line only)	3,504.59
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	-0-
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	3,504.59

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MUR 3177

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

To: General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

92 JAN -6 PM 1:23

From: Michael J. Dunn
3933 South 326th Place
Auburn, WA 98001-9639
(206) 838-5820 @ home
(206) 773-9908 @ work

92 JAN -6 PM 3:37
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

In Re MUR 3177

References: (a) Original complaint by Alan Lindsay of Houston, Texas, to Federal Election Commission, dated 12 November 1990 and designated by FEC as Matter Under Review #3177.

(b) Draft of response from the Libertarian National Committee to a Ms. Mary Taksar of the FEC, being answers to interrogatories previously posed by the FEC, dated 10 July 1991 (copy enclosed).

(c) Report to State Executive Committee, Libertarian Party of Washington State, "Investigation of the Relationship between LPWS Convention Services Group/The Invisible Hand Foundation and the Libertarian Party of Washington State," dated 3 March 1990 (copy enclosed).

(d) The Washington Libertarian, September 1985 (copy enclosed).

(e) The Washington Libertarian, February 1986 (copy enclosed).

(f) The Washington Libertarian, October 1986 (copy enclosed).

(g) Northwest Libertarian, December/January 1987 (copy enclosed).

2204071385 6

Dear General Counsel:

In his complaint MUR 3177, ref. (a), Mr. Lindsay stated in his second paragraph on page 2 that LPWS Convention Services Group (now known as The Invisible Hand Foundation) "appears to be a subcommittee of the Washington State Libertarian Party *(sic)*."

In consequence of your investigation of MUR 3177, you posed interrogatories to the Libertarian National Committee (hereafter: LNC), which responded as per ref. (b) to the best of my understanding. As answer to interrogatory 1b therein (*q.v.*), the LNC described LPWS Convention Services Group to be an agent representing and furthering the interests and obligations of the Libertarian Party of Washington State (hereafter: LPWS), relative to the production of the Libertarian National Convention held in Seattle, Washington, from 31 August to 6 September, 1987.

I wish to present evidence and argument to support the contention that LPWS Convention Services Group (hereafter: CSG) was indeed a subcommittee of and agent for the LPWS. Supporting citations are taken either from my investigative report, ref. (c), or from additional documentation, refs. (d) through (g), enclosed.

I submit herewith the following propositions:

1. *The 1987 Libertarian Party presidential nominating convention was initiated as a project of the LPWS.*

See ref. (c), attachment B1, p. 42, in which the LPWS State Central Committee moved and passed that H. Barron Enterprises be authorized to bring the 1987 LP convention to Seattle (17 September 1983).

2. *The 1987 LP convention was awarded to Mr. Barron, the agent of the LPWS, by the LNC.*

See ref. (d), in which H. "Skip" Barron, the selfsame principal of H. Barron Enterprises, was identified to head the 1987 LP convention organizing team (September 1985), and also ref. (e) (February 1986).

3. *The LPWS exercised its authority over Mr. Barron by removing him from the project and replacing him with LPWS Convention Services Group.*

See ref. (c), attachment B2, pp. 44-46, in which Ruth Bennett, president of CSG, is recorded as speaking on behalf of the LPWS during severance discussions with Mr. Barron (25 October 1986).

4. *The issue of agent selection was understood to be a matter of discretion internal to the LPWS, not involving a relationship with an external organization for which a contract would have been necessary.*

See ref. (c), attachment B3, p. 47, in which Mr. Barron remonstrated over his dismissal by the LPWS State Executive Committee and asserted his right to bring a complaint to the review of the LPWS Judicial Committee, a Party body having jurisdiction exclusively over matters internal to the LPWS (15 November 1986). The relationship between the LPWS and CSG had not been legally formalized with a contract, as would have been required if CSG were not an integral part of the LPWS. Ref. (c), attachment B5, p. 55, reiterates the mutual acceptance of all parties of the LPWS Judicial Committee's jurisdiction in resolving a dispute over agent selection (20 June 1987).

5. *CSG used the LPWS return address for its own return address in receipt of convention registration fees.*

See ref. (f) and ref. (g), in which the return address for the LPWS and for CSG was identically: P.O. Box 23108, Seattle, WA 98102.

6. *Both the LPWS and CSG explicitly understood that the LPWS ultimately was to have been the sole beneficiary of any profits realized from the 1987 LP convention.*

See ref. (c), attachment C1, p. 82, in which CSG stipulated the above intention in Article VI of its Articles of Incorporation. See ref. (c), attachment B5, p. 56, in which the minutes of the LPWS State Executive Committee record the explicit purpose of the LPWS in using CSG as a front organization with which to hold convention profits in reserve for eventual transfer to the LPWS. See also ref. (c), attachment B7, p. 67, in which the LPWS Chairman requested CSG to establish a mechanism by which the 1987 LP convention proceeds would be conveyed to the LPWS (2 April 1988), and again from ref. (c), attachment B8, p. 68, which reiterates this request. See also ref. (c), attachment B9, p. 69, in which the minutes of the LPWS State

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Executive Committee records receipt of $900 from CSG (27 August 1988).

7. By using "LPWS" in its name, CSG identified itself as part of the LPWS.

See ref. (f) for the first use of "LPWS Convention Services."

8. CSG finances were managed from the LPWS treasury and bank account.

See ref. (c), attachment B4, p. 49 & 51, which states that funds for CSG had been held in the LPWS bank account to date (24 January 1987) and that CSG had obtained $654.20 from the LPWS directly, and also ref. (c), attachment B5, pp. 58-59, which states that the LPWS had financed CSG to the sum of $2190.30 to date (20 June 1987).

9. The LPWS State Executive Committee accepted the management of the convention project as its proper business, to be executed by CSG.

See ref. (c), attachment B4, p. 50, wherein the management of the convention by CSG was entertained as "new business" by the LPWS State Executive Committee (24 January 1987), and ref. (c), attachment B6, p. 65, in which the LPWS State Executive Committee deliberated over delegate assignment at the convention (18 July 1987).

10. CSG had been paying bills incurred by the LPWS.

See ref. (c), attachment B5, p. 55 (20 June 1987).

11. There was overlapping membership between the LPWS State Executive Committee and the CSG Board of Directors.

See ref. (c), pp. 19-20, showing Ruth Bennett, David Jones, and Tina Carter to have been officers of the LPWS State Executive Committee during the preparation, holding, and/or aftermath of the 1987 LP convention.

Therefore, I conclude: That the 1987 LP convention was a project of the LPWS, that CSG was selected as an agent from within the LPWS's own ranks and not as an external contractor of services, that CSG and the LPWS shared the same postal address and bank account, that funds were fungible between the two groups, that the purpose of CSG was to benefit the LPWS, that CSG identified itself with the LPWS by name and through overlapping membership of its officers as officers of the LPWS, and that CSG took executive direction from the councils of the LPWS. All these conclusions are compatible with--and only with--the interpretation that CSG was a subcommittee of the LPWS State Executive Committee.

I hereby formally request that MUR 3177 be extended to include the State Executive Committee of the Libertarian Party of Washington State as a respondent (current mailing address of LPWS: P.O. Box 20732, Seattle, WA 98102).

Michael J. Dunn

Michael J. Dunn

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CERTIFICATE FOR INDIVIDUAL ACKNOWLEDGMENT

STATE OF WASHINGTON)
) ss
COUNTY OF King)

On this 3rd day of January, 1992, before me, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Michael J Dunn, to me known or proven on the basis of satisfactory evidence to be the individual who executed the within and foregoing instrument, and acknowledged the said instrument to be his free and voluntary act and deed, for the uses and purposes therein mentioned.

Name of Person

GIVEN UNDER my hand and official seal hereto affixed the day and year in certificate above written.

E HEINSEN
SION EXPIRES
OTARY
UBLIC
-08-95
WASHINGTON

Jeanette Heinsen
Notary Public in and for the State of Washington, residing at
Gig Harbor
My appointment expires:
11-8-95

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J. Dunn to FEC
Re MUR 3177
Ref. (b)

10 Jul 91

Ms. Mary Taksar
Federal Election Commission
999 E St. NW
Washington, DC 20463

Dear Ms. Taksar,

Enclosed please find answers to the interrogatories from the FEC on MUR 3177. These answers were written by Stephen R. Fielder, former LP Treasurer. If you find these answers insufficiently complete, please call me during business hours @ 703 478 5880.

Thank you.

Sincerly,

William Redpath
LP Treasurer

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1.a. State the relationship between the Libertarian National Committee and the Libertarian Party of Washington State.

The Libertarian Party of Washington State is a state party affiliate of the Libertarian National Committee.

The Libertarian Party of Washington State is an autonomous self-governing political association organized under the laws of the State of Washington.

The relationship between the Libertarian Party of Washington State and the Libertarian National Committee is governed by Article 7 of the Bylaws and Convention Rules of the Libertarian Party. See Attachment 1.

1.b. State the relationship between the Libertarian National Committee and LPWS Convention Services Group ("LPWS-CSG").

Upon information and belief, LPWS Convention Services Group is a corporation, formed under the laws of the State of Washington, to accept an assignment of an existing proposal by and between the Libertarian National Committee and the Libertarian Party of Washington State for the Libertarian Party of Washington State to host a Libertarian National Convention to be held in Seattle, Washington, August 31 - September 6, 1987.

Upon information and belief, the incorporators of LPWS Convention Services Group are Ruth E. Bennett, David A. Jones and Bettina R. Carter. Ruth E. Bennett is a current member in the Libertarian Party, David A. Jones is a former member in the Libertarian Party, Bettina R. Carter has no record on file with the Libertarian National Committee and her former membership status with the Libertarian Party is unknown.

The Libertarian National Committee is not and was not an incorporator, director or shareholder in LPWS Convention Services Group.

2.a. Identify the role of the Oversight Committee of the Libertarian National Committee for the 1987 Nominating Convention.

The Oversight Committee of the Libertarian National Committee was created by a resolution of the Libertarian National Committee dated 3 December 1983, which states:

> "CONVENTION OVERSIGHT COMMITTEE: A three-person Convention Oversight Committee is hereby created to consider goals and negotiate contracts, as needed, for future National Conventions and to report back to the LNC on adherence by convention operators to existing contracts."

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Upon information and belief, the members of the Convention Oversight Committee operated within the limits of this authority.

2.b. Describe in detail the duties performed by the Oversight Committee.

With respect to the 1987 National Convention, the Convention Oversight Committee (1) considered the goals of the 1987 National Convention; (2) negotiated a contract between the Libertarian National Committee and LPWS-CSG; (3) attempted to reduce the contract between the Libertarian National Committee and LPWS-CSG to writing and have the same executed by both parties; and (4) reported back to the Libertarian National Committee problems arising in the performance of the contract between the Libertarian National Committee and LPWS-CSG.

2.c. Describe the authority granted to this committee, including but not limited to, payment authorization.

The authority granted to the Libertarian National Committee's Convention Oversight Committee is fully set forth in response to Interrogatory 2.a.

The Libertarian National Committee's Convention Oversight Committee has never been granted payment authorization.

2.d. State whether the Libertarian National Committee had an arrangements committee.

No.

2.e. If so, identify the arrangements committee and detail the duties performed by the arrangements committee.

Not applicable.

3. Identify all fundraising events for the 1987 National Convention by providing the name of each event and the date on which each event was held.

Upon information and belief, there were only two sources of fundraising at the 1987 National Convention, and only one of these two sources is appropriately classified an event:

(1) Convention registration, through September 6, 1987.
(2) Presidential banquet, September 5, 1987.

4.a. State whether the Libertarian National Committee directly received funds or contributions for fundraising events or convention activities.

No.

The Libertarian National Committee did not directly or indirectly receive funds or contributions for fundraising events or

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convention activities related to the 1987 Libertarian National Convention.

Subsequent to the 1987 Libertarian National Convention, the Libertarian National Committee agreed to pay LPWS-CSG the sum of $2,901.78 in settlement of claim. LPWS-CSG asserted against the Libertarian National Committee for services provided in hosting the 1987 Libertarian National Convention. See attachment 2.

4.b. If so, state whether these funds were deposited into a depository.

Not applicable, see response to Interrogatory 4.a.

4.c. Identify the depository into which such funds were deposited.

Not applicable, see response to Interrogatory 4.a.

5.a. Identify total funds or contributions received by the Libertarian National Committee for convention fundraising events or activities.

None, see response to Interrogatory 4.a.

5.b. Identify total funds or contributions received by the Libertarian National Committee for <u>each</u> convention fundraising event or activity.

None, see response to Interrogatory 4.a.

6.a. State whether the Libertarian National Committee directly expended funds for fundraising events or convention activities.

Yes, see response to Interrogatory 4.a.

6.b. Identify total expenses incurred by the Libertarian National Committee for convention fundraising events or activities.

$2,901.78.

6.c. Identify total funds expended by the Libertarian National Committee for <u>each</u> convention fundraising event or activity.

See response to Interrogatory 4.a.

7.a. State whether the Libertarian National Committee transferred any funds to LPWS-CSG for the convention or for the preparation and planning of the convention and related activities.

No.

7.b. If so, identify the event, the date of the event, and the amount and date of any transfers.

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Not applicable.

7.c. State whether LPWS-CSG transferred any funds or contributions received from convention fundraising events or activities to the Libertarian National Committee.

No.

7.d. If so, identify the event, the date of the event, and the amount and date of any transfers.

Not applicable, see response to Interrogatory 7.c.

8.a. State how the convention was funded.

Upon information and belief, the 1987 Libertarian National Convention was funded by LPWS-CSG and convention registration.

8.b. Identify who paid for the convention and the source of funds used to pay for each convention activity or fundraising event.

See response to Interrogatory 8.a.

8.c. Describe in detail how funds raised at convention fundraising events and activities were used.

The Libertarian National Committee received no funds from convention fundraising events and activities.

9.a. State whether the Libertarian National Committee reported any contributions or funds received and expenditures made relating to the convention in its reports filed with the Federal Election Commission. ("Commission").

Expenditures related to paying the debt to LPWS-CSG incurred as a result of the 1987 Libertarian National Convention were duly reported as required.

9.b. If so, identify the contributions, funds, or expenditures relating to the convention which the Libertarian National Committee reported to the Commission.

Agreement as to amount owed occurred during the second half of 1988. Amounts owed and expenditures made were reported on FEC FORM 3X for this and subsequent periods. Schedule D substantiation for line 10 during this period and subsequent periods are attached. See Attachment 3.

9.c. If no reporting was made regarding the convention, state why the Libertarian National Committee failed to report financial activity regarding the convention to the Commission pursuant to 2 U.S.C. § 437(2).

Not applicable.

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M.J. Dunn to FEC
In Re MUR 3177
Ref. (c)

Report to State Executive Committee,
Libertarian Party of Washington State

INVESTIGATION of the RELATIONSHIP between LPWS CONVENTION SERVICES GROUP/THE INVISIBLE HAND FOUNDATION and the LIBERTARIAN PARTY OF WASHINGTON STATE

92040913865

Submitted by

Michael J. Dunn
3933 South 326th Place
Auburn, WA 98001

3 March 1990

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by Michael J. Dunn

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2	SUMMARY OF INVESTIGATION FINDINGS	6
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5	CONCLUSIONS	21
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NOTE: The abridged report does not contain Appendices.

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1 INTRODUCTION

1.1 Background

The 1987 Libertarian {*Party*} National Convention was held during 2-6 September 1987 in Seattle, Washington, at the Seattle Sheraton Hotel and Towers (1400 6th Avenue in downtown Seattle).

The Convention was organized, operated, and administered by LPWS Convention Services Group (CSG), a legal entity created specifically for the Convention project.

The closing of accounts between CSG and the Libertarian {*Party*} National Committee (NatCom) ocurred over a lengthy post-Convention interval. During this interval, controversy arose within the State Executive Committee (SEC) of the Libertarian Party of Washington State (LPWS) concerning the existence and extent of financial obligations of the CSG toward the LPWS. Factors in this controversy included the facts that (a) the Convention had turned a profit, and (b) the CSG had reformed itself into a new organization named The Invisible Hand Foundation (IHF).

At a meeting held 21 October 1989, the LPWS SEC authorized Michael J. Dunn to investigate this controversy and prepare a report of said investigation, presented herewith.

1.2 Charter

The purpose and scope of this investigation, as formulated by the LPWS SEC, was "to determine both an advisory legal position {*for the LPWS*} and a historical review of events leading to the current situation" (SEC minutes, Attachment A1).

More specific direction was proposed by LPWS Chair Marla Bottemiller, as follows (verbatim from memorandum, Attachment A2):

> "1. Was there ever, and is there now, a document or contract showing that the monies in the account of the IHF still rightfully belong to the LPWS? Does the LPWS have legal claim, in other words, to the monies held by (CSG) IHF?...
>
> "2. Is there any reason why the IHF (CSG) cannot restructure itself in the manner planned, and continue in existence in this new form rather than dissolving? If not, why not?
>
> "3. Will the clause in the (CSG's) IHF's Certificate of Incorporation stating that in the event of the CSG's dissolution, its assets are to be distributed to the LPWS still be in force once the restructuring is complete, and does this present problems to the restructuring?...
>
> "4. ...I think it is essential to once and for all document the history behind this affair, for party history and for a final resolution to the animosity between {*sic*} members of the State Executive Committee and others involved."

In accordance with the above, and to the extent possible, this investigation was "to be concluded by the end of 1989" (Attachment A1).

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1.3 Guidelines

In addition to the above charter, this investigator adopted the following guidelines by which to assure an objective, accurate, and complete account.

Disregard of Personality Issues

Although the history of this case is colored by the degree of competence or cooperation demonstrated by various individuals before, during, or after the Convention, regarding the production of the Convention, this investigation disregarded all such issues as moot and therefore of no further concern to the LPWS--except as they may have borne directly on the questions under investigation.

This investigator was privy to considerable personal testimony from the principals of this case and, while much of this information was enlightening, to repeat it here would be a breach of confidence. Moreover, it would not be possible to recount it without reflecting, however inadvertantly, a partisan perspective. Finally, my charter was to investigate and discover the facts, not to pass judgement on the principals.

Reliance on the Documentary Record

To the extent that the charter of this investigation touches on questions of legal liability or obligation, some criterion must be imposed on the information to be accepted as an historical record. In view of the passage of time, the conflict of interpretations, the geographic scattering of some of the principals, and the difficulty of assembling and coordinating corroborative witnesses, verbal accounts were excluded as being hearsay evidence and therefore undependable as a basis for evaluating legal claims or considerations. More specifically, this investigation proceeded on the basis that the doctrine of verbal contract is useless and inoperative when verification is improbable. Consequently, as will be shown, this investigation placed its emphasis on the documentary record of events.

Alertness to Relevant Concerns

The course of any investigation involves the possiblity of serendipitous discovery, this investigation no less than any other. To the extent that issues or concerns were discovered that fell outside the charter described above, but nevertheless touched on the welfare of the LPWS and merited disclosure, these issues were accepted as relevant concerns of the investigation, and so reported.

1.4 Dissemination

This has been an open investigation. This report is available to any member of the LPWS upon compensation for printing cost. Two versions are available: a complete report, including appendices, and an abridged report, without appendices. Please direct inquiries to the author.

1.5 Disclaimer

Though the author has attempted to assemble an accurate factual account of this case, this report necessarily depends on inference and hearsay state-

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ments to fill gaps or obscurities in the documentation. These instances will be identified to the best of the author's recollection. Should any reader be aware of inaccuracies in this report, please contact the author. A revised report will be issued upon discovery of new, relevant information.

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2 SUMMARY OF INVESTIGATION FINDINGS

In response to the charter direction given by the LPWS State Executive Committee, and by the LPWS Chair, this investigation finds the following facts, circumstances, and conclusions to be the most credible account of the case under investigation.

2.1 Discharge of Investigation Charter

In response to the direction from the SEC:

1. The advisory legal position for the LPWS is that: The Invisible Hand Foundation is independent of the LPWS and therefore the LPWS has no legal claim to its assets, in whole or in part.

2. An historical review of events leading up to the current situation, covering the years 1983-1989, is presented in detail as Section 3 of this report.

In response to the direction from the Chair:

1. There is no evidence nor suggestion of any document or contract purporting to show that the monies in the account of the IHF still rightfully belong to the LPWS. Accordingly, there is no legal basis on which the LPWS could assert such a claim.

2. The restructuring of LPWS Convention Services Group into The Invisible Hand Foundation is not in question; it is a *fait accompli*.

3. There was a clause in the Articles of Incorporation for LPWS Convention Services Group that stipulated all net assets would be conveyed to the LPWS upon dissolution of CSG. With the restructuring of CSG into IHF, this clause was revoked.

4. The history behind this affair is schematically presented as Section 3 of this report; additional detail concerning the timelines of key personalities is presented as Section 4 of this report.

Additional relevant conclusions of this investigation are summarized below and are presented in greater detail as Section 5 of this report.

Recommendations for future policy and action are summarized below and are presented in greater detail as Section 6 of this report.

2.2 Summary of Conclusions

The 1987 Seattle LP Convention was the embodiment of a franchise extended by the National Libertarian Party to the Libertarian Party of Washington State.

The LPWS authorized H. Barron Enterprises and, subsequently, LPWS Convention Services Group as agents to produce the Convention as an LPWS project.

All funds collected by LPWS Convention Services Group prior to its incorporation rightfully belonged to the LPWS.

By incorporating, LPWS Convention Services Group expropriated the Convention from the LPWS.

The LPWS State Executive Committee either did not recognize this expropriation for what it was, or condoned it in silence.

By failing to execute a contract with LPWS Convention Services Group,

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the then LPWS State Executive Committee committed misfeasance.

The simultaneous membership of certain individuals in both LPWS Convention Services Group and the LPWS State Executive Committee entailed a conflict of interest.

In lieu of a contract, the LPWS State Executive Committee entrusted the interests of the LPWS to the provisions of Article VI of LPWS Convention Services Group's Articles of Incorporation, and its given assurance that LPWS Convention Services Group would dissolve following the Convention.

In fact, LPWS Convention Services Group did not provide incorporation safeguards to protect the interests of the LPWS under Article VI.

Since incorporation, LPWS Convention Services Group has followed a practice of suppressing the "LPWS" from their public identification and correspondence.

By failing to execute a contract with the LP National Committee, LPWS Convention Services Group precipitated an extensive post-Convention negotiation for resolution of outstanding financial issues; in consequence, Convention profits were substantially reduced.

The decision by LPWS Convention Services Group not to dissolve, and not to support libertarian political activities (especially projects of the LPWS), was a repudiation of the tacit agreement on which the LPWS permitted LPWS Convention Services Group to produce the Convention...and therefore constituted a fraud against the LPWS.

Of the individuals responsible for that decision, Tina Carter acted in conflict with her fiduciary responsibility as a member of the LPWS SEC. Of the individuals responsible for ratifying the incorporation of The Invisible Hand Foundation, Karen Allard, Tina Carter, and Tom Tanaka acted in conflict with their fiduciary responsibility as members of the LPWS SEC.

The Invisible Hand Foundation is not incorporated to meet any obligation of accomplishing a specifically libertarian mission.

2.3 Summary of Recommendations

The LPWS should incorporate.

The LPWS should never employ the agency of any corporation, business, proprietorship, or individual not an officer of the LPWS, without the binds of contractual obligation.

The record of LPWS State Executive Committee meetings should include the full roster of current officers and the roll call of every vote.

LPWS members currently serving as Directors and Agents of The Invisible Hand Foundation should resign immediately from all offices of and positions of responsibility within the LPWS to preclude further conflict of interest detrimental to the LPWS. Failing resignation, they should be removed according to the procedure of Article VII of the LPWS Constitution, on grounds of misfeasance and conflict of interest.

Henceforward, the LPWS should extend no favor, special consideration, recognition, support, publicity, nor sympathy toward The Invisible Hand Foundation.

The LPWS should revise its Constitution and/or By-Laws to preclude future

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possibility of conflicting interest between the LPWS and any other organization or individual, or among the governing bodies of the LPWS.

The positions and functions of the LPWS Secretary should be removed from the State Executive Committee and made part of the Judicial Committee.

Prepared by: Michael J. Dunn — 1 March 1990
Michael J. Dunn — date

Approved by: Marla Bottemiller — 2 March, 1990
Marla Bottemiller
LPWS Chair — date

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3 CHRONOLOGY

17 Sep 83 — The LPWS State Central Committee passed a resolution that

"H. Barron Enterprises be authorized by the L.P.W.S. to bring the 1987 L.P. National Convention to Seattle. Procedes {*sic*} from any moneys {*sic*} raised from the convention and NatCom meetings held in Seattle before the convention will be split 50/50 % after expenses between the L.P.W.S. and the H. Barron Enterprises. Subject to contract approval by the L.P.W.S." (Attachment B1)

20 Apr 85 — H.W. "Skip" Barron, Jr., Region 3 Representative to NatCom (Oregon & Washington) proposed Seattle as the 1987 LP Convention site to the LP National Committee. Reno, Nevada, was selected instead. (The Washington Libertarian, May 1985)

17 Aug 85 — The LP National Committee selected Seattle as the 1987 LP Convention site following withdrawal of the Reno bid. Skip Barron was recognized as the head of the convention organizing team. (LP News, Nov/Dec 1985, p. 6 and The Washington Libertarian, Sep 1985)

Feb 86 — The LP National Committee selected 3-6 September 1987 as the inclusive dates of the Seattle LP Convention. Skip Barron was coordinating the activities. (The Washington Libertarian, Feb 1986)

Sep 86 — Appearance of an article announcing the 1987 Seattle LP Convention, by Tom Tanaka. The article described the Convention as being a project of the LPWS and identified the following individuals as key contacts:

Bill Bradford	(Liberty Bucks project)
Dave Jones	(program director)
Tom Tanaka	(art exhibit)
Skip Barron	(general information)

(LP News, Sep/Oct 1986, vol. 1, no. 5, pp. 1-2)

Oct 86 — Appearance of an advertisement for the 1987 Seattle LP Convention by "LP Convention Services", to whom checks were payable. (The Washington Libertarian, Oct 1986)

25 Oct 86 — The LPWS Executive Committee moved unanimously that

"The LPWS officially recognizes LP Convention Services as the official entity responsible for producing the National Libertarian Party Presidential Nominating Convention in September of 1987."

and that Skip Barron be removed from any position regarding the 1987 Convention. (Attachment B2) Skip's replacement as "LP Convention Production Director" was Richard Shepard. LP Convention Services had the following officers:

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President	Ruth Bennett
Vice-President	Karen Allard
Treasurer	Kimberly Peddicord
Secretary	David Jones

(Northwest Libertarian, Nov 1986)

Nov 86 — Appearance of an article by Rich Shepard soliciting LPWS volunteers to help produce the 1987 Seattle LP Convention. Appearance of two advertisements for the 1987 Seattle LP Convention, one unattributed, the other by "Convention Services." (Northwest Libertarian, Nov 1986)

Appearance of an advertisement for the 1987 Seattle LP Convention by "LPWS Convention Services", to whom checks were payable. (LP News, Autumn 1986, vol. 1, no. 6, p. 5)

15 Nov 86 — Meeting of the LPWS State Executive Committee, at which Skip Barron was ratified as Representative to the LP National Committee, subsequently rescinded. The SEC further took no action to recognize a contract Skip alleged to exist between himself and the LPWS concerning the production of the 1987 Seattle LP Convention. (Attachment B3)

16 Nov 86 — LPWS SEC chose Ruth Bennett to replace Skip Barron as Regional Representative to the LP National Committee. (Northwest Libertarian, Dec/Jan 1986)

Dec 86 — Appearance of an article promoting the 1987 Seattle LP Convention, citing "LP Convention Services Group" as the sponsoring body. (Northwest Libertarian, Dec/Jan 1986)

22 Dec 86 — The "LPWS Convention Services Group" filed articles of incorporation under the non-profit laws of the State of Washington, R.C.W. 24.03, as a "perpetual" corporation. The officers and other principals were:

Ruth Bennett	Director
David Jones	Director
Bettina Carter	Director
Richard Shepard	Registered Agent

The purpose of CSG was specified in Article III, quoted in its entirety below:

> "The purposes for which the corporation is organized are as follows: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 U.S.C. Section 527), as amended, and, any other lawful purpose that political organizations may engage in."

The intended bequest to the LPWS was specified in Article VI, quoted in its entirety below:

> "In the event of dissolution of this corporation, the net assets are to be distributed as follows: To the Libertarian Party of Washington State for its use in functions

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exempt from Federal Tax under the authority of 26 U.S.C. Section 527, as amended."

(Attachment C1)

Jan 87 — Appearance of an unattributed advertisement for the 1987 Seattle LP Convention. (LP News, Jan/Feb 1987, vol. 2, no. 1, p. 16)

24 Jan 87 — Meeting of the LPWS SEC, the minutes of which establish that LPWS funds and CSG funds had been managed from a single LPWS bank account. Henceforward, LPWS and CSG funds were to be independent. (Attachment B4)

21 Feb 87 — Organizational meeting of the Board of Directors of the LPWS Convention Services Group, at which By-Laws were adopted, officers were elected, and the state non-profit corporation annual report was submitted. The By-Laws defined the CSG as a memberless corporation consisting of a self-perpetuating Board of Directors. In the event of the vacancy of all Director positions, any State Superior Court was authorized "to appoint persons to fill such vacancies, such persons to be selected for their interest and ability to carry out the purpose of the corporation." The By-Laws also included an indemnification clause that would have indemnified any of its Directors or Agents against expenses resulting from any legal action brought by outside parties. The elected officers were:

President	Ruth Bennett
Vice-President/ Secretary	David Jones
Treasurer	Bettina Carter

(Attachment C2, c.f. Attachment C1)

Mar 87 — Appearance of an advertisement for the 1987 Seattle LP Convention by "LPWS Convention Services", checks payable to "LPWS-CSG." (LP News, Mar/Apr 1987, vol. 2, no. 2, p. 5)

May 87 — Appearance of an advertisement for the 1987 Seattle LP Convention by "Convention Services Group," to whom checks were payable. (LP News, May/June 1987, vol. 2, no. 3, p. 2)

20 Jun 87 — Meeting of the LPWS SEC, at which the following facts came to light:

(a) "All LPWS bills will now be paid by the LPWS, not CSG. LPWS will give CSG receipts for bills previously paid...."

(b) "CSG is under no obligation to LPWS. It can maintain itself and donate money as desired to LPWS."

(c) CSG expense account was still carried on the LPWS books.

(Attachment B5)

Jul 87 — Appearance of an advertisement for the 1987 Seattle LP Convention by "Convention Services Group," to whom checks were payable. (LP News, Jul/Aug 1987, vol. 2, no. 4, p. 7)

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18 Jul 87 — Meeting of the LPWS SEC, at which the following facts came to light:

(a) By consideration of the possible involvement of the Judicial Committee in relations between the LPWS and CSG, the SEC reflected its understanding that the CSG was to be considered a part of the LPWS and therefore subject to the provisions of the LPWS Constitution and By-Laws.

(b) Discussion of Convention policy regarding Convention delegate replacement, in response to National LP query by Dean Ahmad. Policy decision by LPWS SEC consistent with interpretation of Convention as an LPWS project.

(c) Regarding disposition of funds collected by CSG:

"CSG will do with the money as it sees fit. It's LPWS' {*sic*} duty to apply for the money and convince CSG that they {*LPWS*} are worthy of the money. This will be continually put on the agenda."

(Attachment B6)

Aug 87 — Appearance of an article promoting the 1987 Seattle LP Convention, citing "Convention Services" as the sponsoring body. Appearance of an article soliciting LPWS volunteers to help produce the Convention. (Northwest Libertarian, Jul/Aug 1987)

26 Aug 87 — Conclusion of severance agreement between H.W. "Skip" Barron, Jr., and the LPWS Convention Services Group. The agreement is written so as to fully include the LPWS as co-equal with CSG in respect to the obligations enjoined on Skip. (Attachment C3)

2-6 Sep 87 — 1987 Seattle LP Convention

11 Sep 87 — Richard Shepard resigned as Registered Agent for LPWS Convention Services Group. (Attachment C4)

29 Sep 87 — Notice issued from Washington state Secretary of State's office (Corporations and Trademarks Division) requesting appointment of a new Registered Agent for CSG. Failure to comply by 18 November 1987 could result in "dissolution of the corporation or revocation of the certificate of authority to do business in Washington." (Attachment C5)

16 Oct 87 — Invoice for $ 8278.08 sent to LP National Committee from LPWS Convention Services Group for Convention expenses and fees. (Attachment C6)

4 Nov 87 — Memorandum issued from Clifford Thies, Treasurer of the Libertarian {*Party*} National Committee, in which he disavows any debt by the national LP to CSG for expenses and fees incurred during the Convention. (Attachment C6)

10 Nov 87 — "Convention Services Group" filed a non-profit corporate statement of change, listing Tom Tanaka as their new Registered

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Agent. (Attachment C7)

12 Jan 88 — Communication of settlement proposal from attorneys of LP NatCom to CSG. Proposed settlement sum was $ 2901.78. (Attachment C8)

17 Jan 88 — Response from LPWS Convention Services Group to communication of 12 January, accepting terms. (Attachment C9)

28 Jan 88 — Signing of agreement by Jim Turney, Chairman of national Libertarian Party, releasing the LPWS Convention Services Group from any liability arising from the 1987 Seattle LP Convention. (Attachment C10)

2 Apr 88 — Letter sent to LPWS Convention Services Group (c/o Ruth Bennett) from Karen Allard, LPWS Chair, stating, in part:

"As chairman of the LPWS, I have a request to make of the CSG. I would like the CSG to take the remaining weeks before the state convention to settle all the unfinished business. Many of us not on the CSG board also spent much time on the convention and would like to see the LPWS have access to the convention profits for LPWS candidates and other appropriate projects.

"I would encourage the CSG to transfer the profits to an interest bearing account and set up a board who {*sic*} would receive application from the LPWS Executive Committee for use of these funds. Even if the LPWS would have access to just the interest (keeping the principle {*sic*} intact), {*it*} would be of great benefit to the LPWS in its efforts to expand membership, educate the public about libertarian ideas, and elect libertarian candidates to office."

(Attachment B7)

23 Apr 88 — The "LPWS Convention Services Group" filed a non-profit corporation annual report, listing the following officers and agents:

President	Ruth Bennett
Vice-President	David Jones
Treasurer	Bettina Carter
Registered Agent	Tom Tanaka

(Attachment C11)

28 Apr 88 — Signing of agreement by Richard Shepard releasing "Convention Services Group" and the LPWS from any liability arising from the 1987 Seattle LP Convention. (Attachment C12)

23 Jul 88 — The LPWS SEC requested financial assistance from CSG in the sum of $ 1330. Further, the request included the following statement:

"It is the feeling of the LPWS Executive Committee that there has been ample time to settle the CSG account and have the

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profits from the Convention accessable {*sic*} to the LPWS for use during the campaign season."

(Attachment B8)

12 Aug 88 — Letter from Clifford Thies, Treasurer of LP National Committee, to Convention Services Group (c/o Ruth Bennett) tendering a check for $ 901.78, but withholding payment of the remaining expenses and fees. (Attachment C13)

27 Aug 88 — LPWS received a check for $ 900 from CSG. (Attachment B9)

Sep 88 — Appearance of the following notice by Tom Tanaka:

"A trust fund for the LPWS is to be established with the profits from the 1987 Libertarian National Convention. Convention Services Group, the convention organizers, has already donated $ 1,500 to the LPWS for candidates' filing fees and voters pamphlet fees."

(Northwest Libertarian, Sep 1988)

23 Nov 88 — Receipt of installment payment of $ 100 from the national Libertarian Party to CSG (c/o Ruth Bennett). (Attachment C14)

24 Feb 89 — The "Convention Services Group" filed a non-profit corporation report, listing the following officers and agents:

President	Ruth Bennett
Vice-President	David Jones
Secretary	David Jones
Treasurer	Bettina Carter
Registered Agent	Tom Tanaka

(Attachment C15)

18 Mar 89 — Board meeting of the CSG, at which it was decided unanimously by the attending members of the Board (Ruth Bennett and Tina Carter) to (a) not dissolve the corporation, and (b) not support libertarian political projects--i.e., the LPWS. (Attachment C16)

14 Aug 89 — Letter sent from Richard Shepard to Marla Bottemiller, LPWS Chair, requesting clarification of the relationship and obligations between the LPWS and CSG. A specific concern was the rumor that CSG had "changed its mind about dissolution and intends to reform as a PAC {*political action committee*}." (Attachment A3)

Aug 89 — Memorandum circulated by LPWS Convention Services Group, undated, mentioning the following items:

(a) LPWS Convention Services Group intends to apply for 501-(c)(3) federal tax exemption status, which would preclude them from conveying funds to the LPWS.

(b) The new Board of Directors were:

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President	Ruth Bennett
Vice-President	Karen Allard
Secretary	Jack Allard
Treasurer	Tina Carter
Board Member/ Registered Agent	Tom Tanaka

(c) The CSG bank account stood at $ 22,066.73.

(d) A chronology of events from December 1987 to 3 August 1989 was prepared to explain the delays experienced by CSG in closing out the financial obligations and receipts of the 1987 Seattle LP Convention.

(Attachment C17)

21 Aug 89 Meeting of the LPWS Convention Services Group, at which the following corporate amendments were enacted for filing with the Secretary of State:

(a) Stipulation that LPWS CSG was a corporation having "no members, or no members having voting rights."

(b) Changing registered agent designation to Tom Tanaka.

(c) Changing the corporation name to "The Invisible Hand Foundation."

(d) Revising Article VI of the Articles of Incorporation to read:

"In the event of dissolution of the corporation, the net assets will be distributed only to causes or organizations supporting and furthering the ideals of liberty, that are qualified or would qualify for exemption as organizations described in Section 501(c)(3) of the Internal Revenue Code of 1954, as amended, or a successor statute. Such decision is to be made at the discretion of the Board of Directors."

(e) Revision of the corporation By-Laws to reflect IHF's purpose as being

"To operate exclusively for religious, charitable, scientific, literary, or educational purposes, within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1954."

and to include the new offices of "Past President" and "Executive Director," and to remove the provision by which a State Superior Court could appoint corporate Directors in the event of the vacancy of the entire Board.

(Attachment C18)

5 Sep 89 Letter sent from Richard Shepard to Ruth Bennett requesting the following information from LPWS Convention Services Group:

"a) Copies of any and all documents relating to the purpose, formation and structure of the 'new' CSG, including but not

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limited to By-Laws, Articles of Incorporation, Policy Statements, Statements of Purpose, rules of internal procedure, and meeting minutes.

"b) Copies of profit and loss statements, balance sheets, and tax returns for each year of existence, and CSG check registers, bank statements, and any and all documents prepared for CSG by its accountant(s)."

(Attachment A4)

Sep 89 — Appearance of the following article by Tom Tanaka:

"Non-profit educational foundation announced.

"Convention Services Group, the committee authorized by the LPWS to put on the 1987 Libertarian National convention in Seattle announced that it would adopt a new name, The Invisible Hand Foundation. The reference is from Adam Smith's metaphor that the welfare of society will be raised by an 'invisible hand' when individuals are allowed to pursue their self-interests.

"The foundation will apply for tax exempt status with the IRS. To do so the foundation must be chartered for charitable, educational, or scientific purposes. It may not engage in political activity nor have any ties to a political organization. If the 501(c)(3) status is obtained it will permit the IHF to raise tax free income and permit both individuals and businesses to make tax deductible donations to it.

"After paying off the last of the debts and obtaining money owed by the national {*Libertarian*} party, the final net profit from the convention is $ 22,066. The IHF has budgeted $ 2,000 for the first year's expenses which will include stationery, envelopes, fundraising appeals, accountant fees, and initial projects. The remaining funds will be invested in certificates of deposit and money market funds.

"Activities engaged in by the IHF will be focused on a regional level. Some ideas for initial projects include donations of books, tapes, and other materials to libraries, arranging engagements for public speakers, and sponsoring public interest TV or radio broadcasts.

"Board members of the IHF are Ruth Bennett, Karen Allard, Jack Allard, Tina Carter."

(Northwest Libertarian, Sep 1989)

21 Oct 89 — The LPWS State Executive Committee authorized Michael J. Dunn to investigate the CSG/IHF affair and prepare a report of said investigation. (Attachment A1)

Nov 89 — Appearance of the following article by Tom Tanaka:

"LPWS investigates charges made by committee member.

"At the October 21, monthly meeting, the State Executive Com-

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mittee asked Mike Dunn to undertake an independent fact-gathering inquiry regarding the Invisible Hand Foundation and the events leading up to its formation. The decision was prompted by private correspondence and conversations among State Executive {*Committee*} members which {*sic*} have cast doubt upon the IHF and its personnel, and caused confusion regarding the circumstances under which it was formed.

"At the center of this controversy is Richard Shepard, LPWS Campaigns Chair. Not making specific allegations, Shepard claims that the formation of the IHF was improper, if not illegal, and that the funds in its account belong to the LPWS or that the IHF should be controlled by the LPWS. Shepard, a practicing attorney, asserts that an unwritten agreement has been in existence to this effect.

"The IHF was formed out of {*the LPWS*} Convention Services Group which was authorized by the LPWS to produce the 1987 Libertarian National Convention in Seattle. The IHF is organized as a non-profit, non-political, educational foundation with no ties to the Libertarian Party. This is a requirement for obtaining non-profit 501(c)(3) status with the IRS which has been initiated. This status allows a non-profit corporation to receive tax deductible donations from individuals and businesses (See NWL Sept. 1989).

"Michael Dunn is currently the Chief Justice of the Judicial Committee. However Dunn's role is advisory rather than adjudicative. He was nominated by unanimous vote of the committee as the independent investigator.

"The IHF board disputes the validity of Shepard's claims. They requested the independent fact finding inquiry before the meeting as a way to disspell {*sic*} the confusion and help repair hurt feelings that have been steadily worsening since Shepard began communicating his thoughts to other SEC members this summer. State Chair Marla Bottemiller made the proposal to the committee. The IHF personnel present pledged full cooperation with Mike Dunn.

"The IHF consists of Ruth Bennett, president; Karen Allard, vice president; Tina Carter, treasurer; Jack Allard, secretary; and Tom Tanaka, registered agent.

"Since many current LPWS members, including most SEC members, were not involved during the years prior to and following the 1987 convention it is difficult for them to seperate {*sic*} fact from personal opinion through private conversation with the key players. Hopefully Mr. Dunn's findings will establish the truth with certainty and help the LPWS to avoid similar misunderstandings in the future."

(Northwest Libertarian, Nov 1989)

18 Nov 89 At the LPWS State Executive Committee meeting,

"Mike Dunn delivered a preliminary report. He has reviewed the pertinent minutes and other documents pertaining to the

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creation of the CSG. He stated:

> 'It is fairly clear that the Invisible Hand Foundation is free and clear of any obligation to the LPWS, and moreover that this fact was acknowledged by the State Executive Committee.'

He also stated that the investigation was not yet complete."

(Attachment B10)

Dec 89 Appearance of the following article by Tom Tanaka:

"Investigation clears IHF of Shepard's charges.

"In a verbal report given at the Nov. 11, SEC meeting, the Invisible Hand Foundation was declared to be a seperate {*sic*} organization with no connection or responsibilities toward the Libertarian Party, either now or in the past when it was called {*LPWS*} Convention Services Group. (See Nov. '89 NWL)

"Campaigns Chair Richard Shepard had stated at the previous month's meeting that, '...the SEC is the proper body to be deciding the disposition of the proceeds; that it has the right to determine the parameters of the scope of the IHF, and to appoint directors...and for the matter even to determine if the IHF should be a separate organization.'

"The report was given by Mike Dunn, head of the Judicial Committee, in his advisory role as an independent investigator. Dunn considers the controversy to be a dead issue. In his view, a lack of written agreements led to the problems and misunderstandings regarding the IHF. A written report will be issued later."

(Northwest Libertarian, Dec 1989, c.f. Attachment A1)

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4 PERSONAL TIMELINES

To facilitate the understanding of some of the issues to be raised in Section 5 (Conclusions), the following individual careers are presented.

Individuals appear in alphabetical order. To the extent possible, dates have been verified by documentation (attached Appendices, LPWS SEC minutes, or LPWS newsletter accounts).

Karen Allard

22 Sep 84 - 7 Jun 86	LPWS Pierce Co. Representative
23 Mar 85 - 7 Jun 86	LPWS Vice-Chair
19 Oct 85 - 7 Jun 86	LPWS Membership Chair
25 Oct 66 - Mar 87	CSG Vice-President
21 Feb 87 - 16 May 87	LPWS Pierce Co. Representative
16 May 87 - 17 Jun 89	LPWS Chair
Aug 89 - Present	IHF Vice-President
Sep 89 - Present	Region 1 NatCom Representative

Ruth Bennett

5 Sep 83 - Feb 86	At-Large NatCom Representative
20 Jul 85 - 7 Jun 86	LPWS Chair
7 Jun 86 - 21 Feb 87	LPWS Pierce Co. Representative
25 Oct 86 - Present	CSG/IHF President
16 Nov 86 - 6 Sep 87	Region 3 NatCom Representative

Tina Carter

20 Oct 85 - 7 Jun 86	LPWS Communications Chair
7 Jun 86 - 17 Jun 89	LPWS Membership Chair
21 Feb 87 - Present	CSG/IHF Treasurer
17 Jun 89 - Present	LPWS Finance Chair

David Jones

22 Jul 84 - 19 Oct 85	LPWS Secretary
19 Oct 85 - 17 Oct 87	LPWS Campaigns Chair
25 Oct 86 - 21 Feb 87	CSG Secretary
21 Feb 87 - Aug 89	CSG Vice-President & Secretary

Tom Tanaka

Aug 84 - Nov 86	Editor, THE WASHINGTON LIBERTARIAN
20 Jan 85 - Present	LPWS King Co. Representative
Dec 86 - Present	Editor, NORTHWEST LIBERTARIAN
Mar 87 - Sep 87	CSG Ad Production & Graphics
16 May 87 - Present	LPWS Judicial Committee member
10 Nov 87 - Present	CSG/IHF Registered Agent

These timelines are further illustrated in the following graph, in which times of tenure are shown as bars spanning the stated dates, and coded to represent LPWS involvement (open) or CSG/IHF involvement (shaded). Pertinent critical dates are also highlighted as shown.

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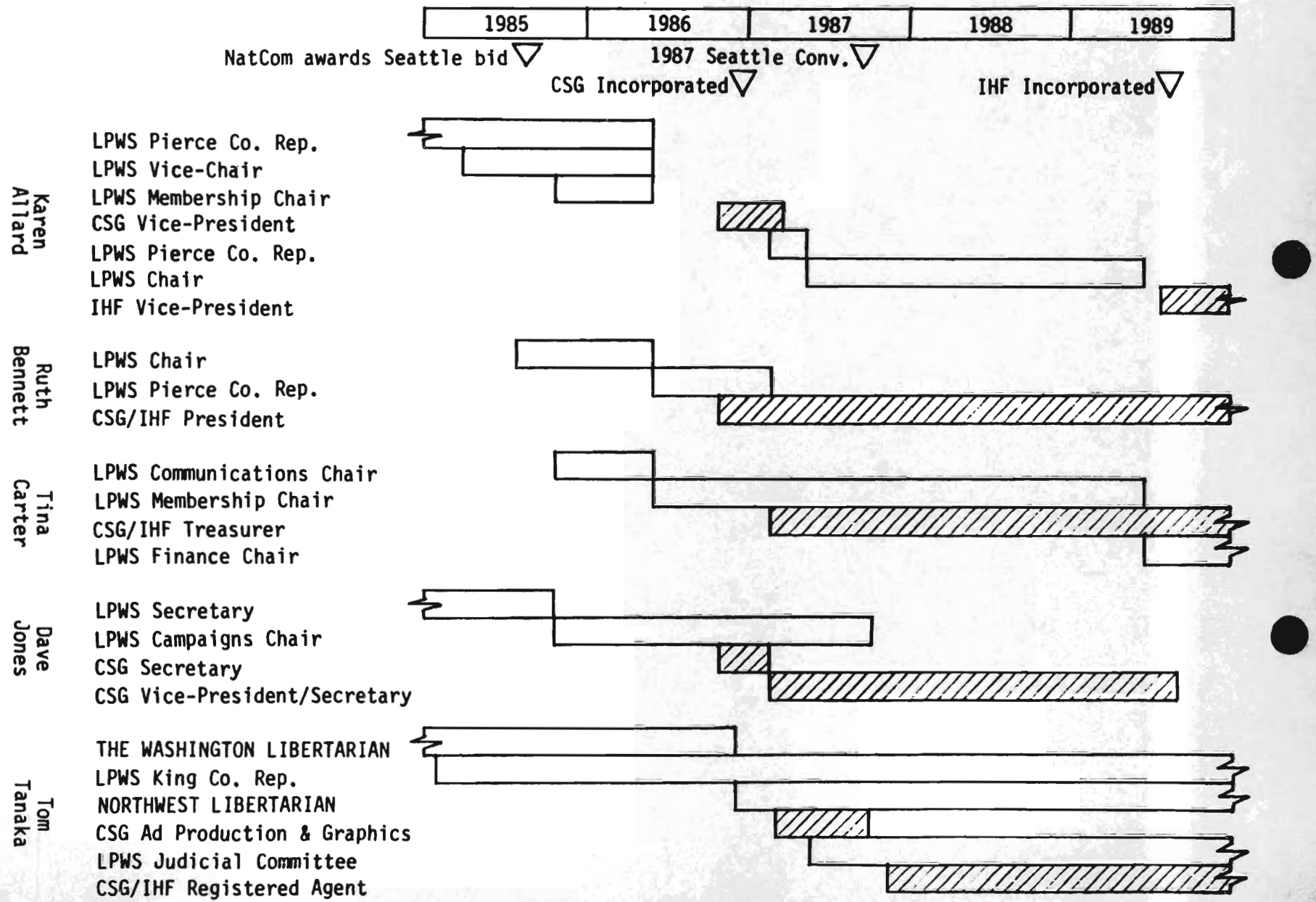
1985
1986
1987
1988
1989
NatCom awards Seattle bid
1987 Seattle Conv.
CSG Incorporated
IHF Incorporated
Karen Allard
LPWS Pierce Co. Rep.
LPWS Vice-Chair
LPWS Membership Chair
CSG Vice-President
LPWS Pierce Co. Rep.
LPWS Chair
IHF Vice-President
Ruth Bennett
LPWS Chair
LPWS Pierce Co. Rep.
CSG/IHF President
Tina Carter
LPWS Communications Chair
LPWS Membership Chair
CSG/IHF Treasurer
LPWS Finance Chair
Dave Jones
LPWS Secretary
LPWS Campaigns Chair
CSG Secretary
CSG Vice-President/Secretary
Tom Tanaka
THE WASHINGTON LIBERTARIAN
LPWS King Co. Rep.
NORTHWEST LIBERTARIAN
CSG Ad Production & Graphics
LPWS Judicial Committee
CSG/IHF Registered Agent

5 CONCLUSIONS

I submit the following conclusions as discoveries from the documentary and testimonial record, or as inferences supported thereby.

I would preface these conclusions by pointing out the single issue that is crucial to an understanding of this case, namely: the property status of the Convention project itself.

5.1 The 1987 Seattle LP Convention was the embodiment of a franchise extended by the National Libertarian Party to the Libertarian Party of Washington State.

That the production of the Convention was a *franchise* (*i.e.*, a special privilege granted to an individual or a group) is established by the fact that permission for its undertaking had to be obtained from the LP National Committee (17 August 1985).

That the franchise was extended to the LPWS is acknowledged by both the initiator of the project (Skip Barron) and the single individual in charge of the eventual production (Ruth Bennett). When Skip Barron presented the Seattle bid to the LP National Committee, he did so in his capacity as Region 3 Representative, on behalf of the LPWS, of which he was an agent. Insofar as the LPWS was represented on the National Committee, it necessarily was a constituent member of the National LP. Therefore, the extension of the Convention franchise was a delegation of authority from the National LP to the LPWS for the purpose of producing the Convention as a National LP project.

5.2 The LPWS authorized H. Barron Enterprises and, subsequently, LPWS Convention Services Group as agents to produce the Convention as an LPWS Project.

That the Convention was an LPWS project--and was so regarded--is established by (a) the delegation of franchise described above, (b) the acknowledgement of the power of the LPWS Executive Committee to authorize or remove "official" agents in the execution of the project, (c) the oversight of Convention project finances by the LPWS, (d) the broadly understood premise that the LPWS was to have been a major beneficiary of the Convention profits, and (e) the use of the appellation "LPWS" in the name of the project organization.

5.3 All funds collected by LPWS Convention Services Group prior to its incorporation rightfully belonged to the LPWS.

This follows logically in consequence of the then status of LPWS Convention Services Group as an agency of the LPWS.

5.4 By incorporating, LPWS Convention Services Group expropriated the Convention from the LPWS.

Upon incorporation (22 December 1986), the principals of LPWS Convention Services Group (Ruth Bennett, David Jones, and Tina Carter) unilaterally altered their status from being agents of the LPWS, and therefore only stewards of the Convention assets, to being legally-independent actors *still in possession of those assets*.

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5.5 The LPWS State Executive Committee either did not recognize this expropriation for what it was, or condoned it in silence.

The LPWS State Executive Committee (*circa* 20 December 1986) comprised the following individuals:

Tom Olsen	LPWS Chair
*Tina Carter	LPWS Membership Chair
*David Jones	LPWS Campaigns Chair
Margot Hamilton	LPWS Communications Chair
*Tom Tanaka	LPWS King Co. Representative
*Karen Allard	LPWS Pierce Co. Representative
Loretta Czap	LPWS Spokane Co. Representative

Those marked with an asterisk (*) were principals of or workers for LPWS Convention Services Group, who must be presumed to have been aware of the plan to incorporate. As LPWS SEC members, they were obliged to disclose the plan and discuss its implications among the other members of the SEC. Moreover, because they constituted a majority voting block within the SEC, passive acceptance of LPWS Convention Services Group incorporation depended completely on their lack of opposition.

The CSG incorporation was announced at the 20 December 1986 meeting of the LPWS SEC by Richard Shepard, then Convention Director. No critical discussion was recorded. (Attachment B11)

Expropriation of the Convention assets could not be recognized unless the SEC acknowledged that CSG was independent of SEC control, a fact that must have been understood by the members of CSG.

Nevertheless, the lack of recognition of CSG's independence was apparent in the SEC's willingness to maintain a CSG expense account in the LPWS treasury until approximately 20 June 1987, and also by the presumption of the SEC that relations between CSG and the LPWS were subject to regulation by the LPWS Constitution and By-Laws (18 July 1987)--a supposition that could only make sense if CSG was regarded as part of, or an agent of, the LPWS.

Further evidence of a confusion of identity between CSG and the LPWS is reflected in the text of the severance agreements negotiated with Skip Barron (26 August 1987) and Richard Shepard (28 April 1988), in which the LPWS is named as an equal party with CSG in the terms of agreement--an appearance and a status without any authorization or concurrence by the LPWS SEC. Because these severance agreements were negotiated without official LPWS involvement, it therefore follows that inclusion of the LPWS into the terms of the agreement was a unilateral act on the part of CSG, furthering the appearance of an identity of purpose and action between CSG and the LPWS.

A circumstantial factor that doubtless fostered and helped to sustain this confusion of identity was the joint membership in both CSG and the LPWS SEC by individuals having policy-making authority *in both organizations* (*i.e.*, David Jones and Tina Carter). With the overlapping of membership in CSG, the remaining members of the SEC quite plausibly regarded CSG as merely an extension of the SEC, facts to the contrary. It may further be supposed that the CSG personnel never thought to disturb this impression.

Residual confusion as to the actual independence of CSG has persisted until the commissioning of this investigation (see Attachments A1, A2, and B10)

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5.6 By failing to execute a contract with LPWS Convention Services Group, the then LPWS State Executive Committee committed misfeasance.

Misfeasance is a legal term denoting the performance of a lawful act in an unlawful or culpable manner. As used in this instance, I mean it to signify an action (or inaction) by the LPWS SEC that is technically permissible under the LPWS Constitution and By-Laws, yet contrary to the spirit and intent of Article VII, paragraph 5, of the LPWS Constitution (it being patent that "management" of LPWS affairs, properties, and funds is in contradistinction to "mismanagement").

It is implicit in Article VII, paragraph 5, of the LPWS Constitution that LPWS SEC members have a *fiduciary* responsibility (*i.e.*, a responsibility as trustee of the LPWS membership) to preserve the assets and advance the interests of the LPWS. By failing to execute a contract with CSG--and by acquiescing to CSG's independence, whether recognized or not--the LPWS SEC allowed the following assets, benefits, and advantages to accrue to CSG *without compensation* to the LPWS:

1. Presumptive property rights to the Convention franchise.
2. Presumptive property rights to funds collected from Convention sales or donations, up to the time of incorporation.
3. Presumptive license to utilize the LPWS name (in abbreviation) and, thereby, to enjoy the color of its reputation and the appearance of affiliation.
4. Access to LPWS communications media and membership for the purpose of enlisting a volunteer (unpaid) workforce for the Convention.
5. Absence of any financial obligation to the LPWS.

Furthermore, these assets and benefits were relinquished despite the fact that CSG's Articles of Incorporation *did not obligate it* to produce a Libertarian Party Convention--nor, for that matter, to pursue any specifically libertarian project whatsoever. (Attachments C1 and C2)

5.7 The simultaneous membership of certain individuals in both LPWS Convention Services Group and the LPWS State Executive Committee entailed a conflict of interest.

As presented above, those individuals named in Section 5.5 as holding joint membership were *de facto* instrumental in permitting advantages to accrue to CSG, contrary to their fiduciary responsibility to the LPWS. Because they constituted a majority voting block within the SEC, the failure to execute a contract with CSG depended completely on their lack of opposition.

5.8 In lieu of a contract, the LPWS State Executive Committee entrusted the interests of the LPWS to the provisions of Article VI of LPWS Convention Services Group's Articles of Incorporation, and its given assurance that LPWS Convention Services Group would dissolve following the Convention.

Article VI provided for all Convention profits to be conveyed to the LPWS upon dissolution of CSG. (Attachment C1) Being a provision of incorporation, Article VI had as much legal force as any contract and therefore was thought to be equally dependable as a warrant on CSG's compliance. The

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belief that CSG would actually dissolve was supported by faith and trust in the integrity and probity of CSG principals, most of whom (it already has been observed) were simultaneous members of the LPWS SEC, and thus viewed as being willing to honor their fiduciary responsiblity to the LPWS exclusive of any conflict of interest. This faith and trust was commonly and sincerely held as late as 23 July 1988 (Attachment B8) and was advertised as late as September 1988.

5.9 In fact, LPWS Convention Services Group did not provide incorporation safeguards to protect the interests of the LPWS under Article VI.

According to the CSG By-Laws (Attachment C2), the simultaneous vacancy of the Directors (as from their collective demise in a traffic accident) would have permitted the appointment of entirely new Directors by any State Superior Court, such Directors to be chosen from the general population according to their interest in and aptitude for pursuing the objectives of the corporation. Insofar as the purposes cited in Article III in no way stipulated a libertarian motive or objective for the corporation, such new Directors would have been free to reform the corporation to their own personal purposes, nullifying the provisions of Article VI. (Attachment C1)

This scenario effectively is a *fait accompli* upon the formation of The Invisible Hand Foundation.

5.10 Since incorporation, LPWS Convention Services Group has followed a practice of suppressing the "LPWS" from their public identification and correspondence.

This fact is established by the documentary record. It would have been consistent with a desire by CSG to establish a precedent for subsequent assertion of independence from the LPWS.

5.11 By failing to execute a contract with the LP National Committee, LPWS Convention Services Group precipitated an extensive post-Convention negotiation for resolution of outstanding financial issues; in consequence, Convention profits were substantially reduced.

The first statement is established by the documentary record. The assessment of Convention profitablity comes from statements by Ruth Bennett, and from comparison of the invoice value charged against the LP National Committee ($ 8278.08, Attachment C6) *versus* the settlement value ultimately negotiated ($ 2901.78, Attachment C8)--a profit reduction of $ 5376.30.

5.12 The decision by LPWS Convention Services Group not to dissolve, and not to support libertarian political activities (especially projects of the LPWS), was a repudiation of the tacit agreement on which the LPWS permitted LPWS Convention Services Group to produce the Convention...and therefore constituted a fraud against the LPWS.

This fact is established by the documentary record and the canons of honesty.

5.13 Of the individuals responsible for that decision, Tina Carter acted in conflict with her fiduciary responsibility as a member of the LPWS SEC.

Of the individuals responsible for ratifying the incorporation of The Invisible Hand Foundation, Karen Allard, Tina Carter, and Tom Tanaka acted in conflict with their fiduciary responsibility as members of the LPWS SEC.

The policy decision not to dissolve CGS was made by Ruth Bennett and Tina Carter (18 March 1989, Attachment C16). Because she could have withheld a majority approving vote, acceptance of this disadvantage to the LPWS depended completely on Tina Carter's consent.

The subsequent ratification of this policy within the IHF Articles of Incorporation was made by the current IHF Board of Directors (21 August 1989, Attachment C18). Because they could have withheld a majority approving vote, acceptance of this disadvantage to the LPWS depended completely on the joint consent of Karen Allard, Tina Carter, and Tom Tanaka.

5.14 The Invisible Hand Foundation is not incorporated to meet any obligation of accomplishing a specifically libertarian mission.

Article III of the IHF Articles of Incorporation (Attachment C18) provides only that "The corporation is organized exclusively for educational, charitable, scientific, and literary purposes, within the meaning of Section 501 (c)(3) of the Internal Revenue Service {*sic*}." The By-Laws do not provide any further stipulations.

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6 RECOMMENDATIONS

In the investigation of this case, certain themes recurrently appeared as contributing elements in the negligence, confusion of purpose, and mismanagement characterizing LPWS behavior:

-- the absence of clear boundaries to the LPWS's identity as an organization, or to the responsibilities of its officers

-- the unwillingness of LPWS officers to bind delegated agents with legal accountability

-- a style of recordkeeping that obscures the authorship of LPWS policy and potentially compromises the objectivity, accuracy, completeness, and security of the records

-- the toleration of conflict of interest, real or potential

With a view toward learning from these mistakes, the following recommendations are offered as advice for the determination of immediate policy by the LPWS State Executive Committee, and as cautionary guidance for the LPWS State Convention by which to avoid similar cases in the future.

6.1 The LPWS should incorporate.

At present, the LPWS is an informal organization--a club, if you will--in which policy determination and actions are constrained only by the honor system, there being no enforceable sanctions available to impose compliance with, or definition of, organizational purposes and methods. As a result, LPWS policy is literally in the hands of whomever wants to dispose of it, and the LPWS has grown accustomed to ignoring issues of responsibility and obligation, in favor of achieving progress on some favored project. Internal disputes over policy thereby tend to become issues of personal "political" advantage within the organization.

The resultant partisan atmosphere cannot fail to infect the record-keeping function, either as neglect of controversy or as prejudice of the record.

Incorporation clearly would be no panacea for the ills of egotism and intolerance, but it would compel the LPWS to conduct its affairs in an environment wherein legal sanctions would exist as a remedy against unacceptable official conduct. Further, the legal reporting requirements would necessitate the establishment of a minimum standard of record-keeping practice. More importantly, however, incorporation as a legal entity would constrain future policy to be formulated and executed with a primary concern for the explicit definition of roles and obligations for the LPWS's officers, members, and agents. Finally, incorporation would enable the LPWS to protect its assets from expropriation or unlawful use, through the principle of legal ownership.

6.2 The LPWS should never employ the agency of any corporation, business, proprietorship, or individual not an officer of the LPWS, without the binds of contractual obligation.

The wisdom of this recommendation should amply be apparent in retrospect. It merits inclusion in the LPWS Constitution or By-Laws.

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6.3 The record of LPWS State Executive Committee meetings should include the full roster of current officers and the roll call of every vote.

After reviewing LPWS SEC minutes from 1983 to the present, I can state with some authority that their clarity, completeness, or continuity range from mediocre to deplorable. It is impractical (and even undesirable) to expect the written record to constitute a verbatim transcript of the proceedings, but it is at least essential to accurately record the names of the individuals making policy and which policies they individually approved, rejected, or silently ignored. This information is required to fix responsibility for policy in the event of appelate action by the Judicial Committee.

Other deficiencies of the official LPWS records are beyond the scope of this investigation, but deserve further consideration on their own accord.

6.4 LPWS members currently serving as Directors and Agents of The Invisible Hand Foundation should resign immediately from all offices of and positions of responsiblity within the LPWS to preclude further conflict of interest detrimental to the LPWS. Failing resignation, they should be removed according to the procedure of Article VII of the LPWS Constitution, on grounds of misfeasance and conflict of interest.

The documentary and historical record uncontrovertably establishes the active conflict of interest within these individuals concerning their actions on behalf of the IHF and the neglect of their fiduciary responsibility to the LPWS. Further opportunity for such conflict of interest should not be tolerated.

6.5 Henceforward, the LPWS should extend no favor, special consideration, recognition, support, publicity, nor sympathy toward The Invisible Hand Foundation.

Insofar as the IHF has attained its present existence, prosperity, and future prospects through the expropriation of the Convention franchise and the fraudulent revocation of past promises to the LPWS, it must be considered that the LPWS is under no further obligation, moral or otherwise, to promote the fortunes of the IHF in any official way.

6.6 The LPWS should revise its Constitution and/or By-Laws to preclude future possiblity of conflicting interest between the LPWS and any other organization or individual, or among the governing bodies of the LPWS.

By now, this should be seen as common sense, though specific wording of corrective language clearly requires further deliberation.

To address the first issue, the formulation may prohibit any member from holding LPWS office if they are also members of an organization having a separate legal or financial relationship with the LPWS.

To address the second issue, the formulation may prevent LPWS members from serving simultaneously on the State Executive Committee, Judicial Committee, or as State Convention officers.

6.7 The position and functions of the LPWS Secretary should be removed from the State Executive Committee and made part of the Judicial Committee.

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Despite their integrity, it is natural for a person recording the proceedings of a deliberating body to feel sympathy for, agreement with, and lenience toward one's perceived colleagues--thus raising the issue of whether such a record could be sufficiently objective to support the possibility of Judicial Committee review.

Thus, this recommendation consists only of taking paragraph 6 of Article II of the LPWS By-Laws (Duties of the Executive Committee) and moving it, intact, to a position under Article XII (Judicial Committee). The Secretary would perform as usual, but would have no vote on the SEC and would function as the Judicial Committee's guarantor of an impartial, accurate, and complete written record.

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APPENDIX A

CORRESPONDENCE MOTIVATING THIS INVESTIGATION

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Minutes of the L.P.W.S. State Executive Committee meeting
October 21, 1989 - 11:00 am
Home of Marla Bottemiller, Bellevue

Present:

Mike Dunn
Thom Landsberger
Rich Shepard
Lee Woofenden
Tom Tanaka
Tina Carter
Karen Allard
Marla Bottemiller
Klaus Heise
Jay Kidder
Dave Rogers

Absent:

Mary Jo Swedenberg
Steffan Gay
Loretta Czap

Call to Order:

The meeting was called to order at 11:20 by Marla. She called for a suspension of the normal order of business in order to address the vacancy at the position of secretary. Dave Rogers was nominated, seconded, and approved for the position.

Old Business:

CHAIR: Marla

Correspondence:

FIJA

Marla has received a lot of information and phone calls regarding the Fully Informed Jury Amendment (FIJA). Larry Dodge asked her for a verbal commitment to submit this initiative to the secretary of state when it is ready. This commitment was given by her as an individual and not as State Chair.

Nation Party Information

Several inquiries have been received regarding the availability of National materials - constitution, platform, etc. These materials have not been forthcoming.

Voucher Initiative:

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Marla called a meeting to discuss this drive, and of 9 who committed to be there, only Rich and Dave actually made it. It was proposed that we "back-burner" this initiative for the next 6 months or so, and learn some more about voucher experiences in other states (Vermont) and about the applicable areas of the state constitution and laws.

Some feel that the Voucher Initiative could suffer by having the "Libertarian Label" on it. Marla expressed concern that if we drop this issue to pursue another (e.g. FIJA), we could easily be in the same position in another 3 months on that issue.

No one could come up with a person to either head up our voucher initiative efforts, or to act as an interface with the Washington Federation of Independent Schools, who is considering such an initiative. It was decided that Marla would send a letter with our regrets for not being able to attend their 1989-90 kickoff meeting, and expressing our desire to maintain contact and to help if we can.

FIJA:

The Montana initiative will probably require changes for this state, but should be a useful prototype. Rich expressed high interest in the initiative for the project both personally and for the SEC.

Rich suggested that it might be a good idea to put the initiative to the legislature first, let them sit on it for 6 months and send it to the people. This would give initiative organizers a year instead of six months to collect the 200,000 plus signatures required to ensure 150,000 valid signatures.

There was a lengthy discussion about the intent, history, and possible ill effects of a FIJA in our state. The discussion was finally tabled until New Business.

SEC Consideration of Invisible Hand Foundation Investigation:

Marla provided (with much help), an overview of some of the circumstances that have led up to the current situation. The issue has been spearheaded by Rich, who states:

> My contention is that the SEC is the proper body to be deciding the disposition of the proceeds [from the national convention]. That it [the SEC] has the right to determine the parameters of the scope of the IHF, and to appoint directors ... and for that matter even to determine if the IHF should be a separate organization.

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Discussion then centered on the correspondence between Rich and members of IHF. It was alleged that Rich's letters "gave the impression" that he had the authority of the SEC backing his inquiries. Dave and Lee made separate motions designed to restrict the use of LPWS-like letterhead. These were seconded but defeated after much discussion.

Rich suggested that perhaps we should have the secretary create a correspondence protocol. Marla suggested that the motions were useless, as the case in question was a matter for personal discretion, and not for legislation.

Karen stated that this is a serious, $22,000 issue and that "the money is being kept in the [CSG] account until the final dots and t's are crossed in this change of a name."

Several members responded to the allegations of poor taste in Rich's letters by stating that the responses to Rich by Ruth Bennett and by the IHF were very inappropriate.

Thom moved that the SEC allocate funds and authorize an investigation of the LPWS/IHF controversy, to be concluded by the end of 1989. The investigation is to determine both an advisory legal position and a historical review of events leading to the current situation.

Karen, speaking as a vice president of IHF, pledged 100% cooperation with the investigation. Thom nominated Mike Dunn as the special investigator. This was approved unanimously. A 7 1/2 minute recess was called.

Campaigns: Rich

Susan Coffey Campaign

Susan Coffey won the primary by better than 50% of the vote. She has resigned from the party in order to avoid negative publicity that has arisen and could arise from her membership in the party. She has requested that party members "doorbell" for her.

Lee brought up the issue of the confidentiality of LPWS records. Our response to inquiries about a person's membership in the party should be that our records are confidential.

Communications: Open

Thom resigned his position due to personal time conflicts. Dave Van Horn was nominated to fill this position contingent on his joining the party. It was understood that he would not be attending the meetings. The nomination was seconded and approved by the majority of those present.

Finance: Tina

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Account

There is $1,368.05 in the LPWS account with some major expenditures still outstanding for stationary from Quill corporation.

U.S. West Advertising

They have sent a bill/signup for our white pages listings. We are currently listed in Olympia, Tri-Cities, Spokane, Tacoma, Vancouver, Bellevue, South King County, and Seattle. Additions need to be made by November 10th, with an estimated cost of $1.50 to $3.00 per book per month depending on the size of the book.

Rich moved that we add Bremerton, Yakima, Bellingham, Everett, and Skagit. This was seconded by Lee and approved.

Accounting

Tina received approval to copy our checkbooks for the last four years in order to provide the LPWS accountant with information required by the IRS of LPWS.

Membership: Lee

Stationary has been delayed by billing arrangement problems with Quill. These should be resolved now. An updated membership list has been requested from national, but still is not available. National has offered a 50/50 split of membership fees to state party organizations until December 10th.

Lee suggested prospecting the 120 or so LPWS members who are not national members. Assuming that the old count of 120 persons is close, we would need only 6 signups to break even (cost of mailing $40.50). Lee moved that the SEC fund the national membership mailer contingent on on receiving an updated national membership printout for the state. This was approved.

Renewal postcards should be ready by the next meeting. The phone tree should be ready for inclusion into November's "Northwest Libertarian". Lee moved that we print up 1000 sheets of 3-up membership forms for inclusion in mailings at a cost of $35.48. This was approved.

Membership Statistics:

Total Members	171
King County	78
Pierce County	21
Snohomish County	14
Skagit County	6
Greys Harbor County	6
Spokane County	5

Expired Members	127
Newsletter Only	16
Expired Newsletter	10
Prospects	683
National not LPWS	86
LPWS not National	120

"Northwest Libertarian": Tom

The deadline will be moved up to the Monday after the SEC meeting. Tom will be able to produce the newsletter at a reduced cost to the party by using his own Laser Writer.

Secretary: Dave

Nothing.

Northwest Region National Representative: Karen

National membership is just under 8,000. As membership chair of the national party Karen will attempt to improve the historically dismal renewal rate by "servicing the customer". She will try to institute a new membership packet with assorted goodies.

It was suggested that renewing and new members should have ready access to major party documents - platform, constitution, etc. It was suggested that the "LP News" should be a monthly publication, to give it some vitality.

Karen discussed the fund raising reception that she and Jack are hosting November 11th in Tacoma. The proceeds are to be equally split between the LPWS and the Pierce County chapter for Campaign '90. The letter of invitation was approved by Marla and professionally printed by Tom. The stamping of envelopes and sticking of labels proceeded throughout the meeting.

Representatives:

King: Marla (Mary Jo absent)

The September meeting was attended by 12 people. Ralph Nero spoke about the laws regarding keeping someone alive and the economics of nursing homes. Property rights continues to be a big issue in King County in light of the current "downzoning" plans.

Pierce: Klaus

The next meeting is to be November 14th or 16th (TBA). Rich's presentation at a Safe Streets meeting was very successful. Rich's latest drug theme predicts that the

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current war on drugs is "leading to an american fascist apartheid."

Skagit: Jay

The Libertarian discussion group with John Blake has found a home at Burlington High School and is going very well. It has the air of a graduate course in political philosophy.

They are planning a fund raising event - a garage sale is the present plan. Jay has a goal of getting a Watcom County chapter started.

Snohomish: Lee (Steffan absent)

They are still trying to get a meeting going.

Environmental Liaison: (Margot absent)

Nothing.

New Business:

Move to adjourn:

Rich moved to adjourn. The motion was seconded and enthusiastically approved.

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Attachment A2

To: Mike Dunn
From: Marla Bottemiller
Subject: Specific points concerning possible SEC-sanctioned investigation into the Invisible Hands Foundation
Date: October 21, 1989

Mike:

You have asked for a list of specific objectives to be considered in directing a possible investigation into the matter of CSG (Convention Services Group), the now-defunct predecessor of the current group, the Invisible Hands Foundation (IHF), and the IHF's current set-up and possible infractions and contractual difficulties with the Libertarian Party of Washington State (LPWS).

My proposed directions include the following:

1. Was there ever, and is there now, a document or contract showing that the monies in the account of the IHF still rightfully belong to the LPWS? Does the LPWS have legal claim, in other words, to the monies held by (CSG) IHF? This bears investigation in my mind.

2. Is there any reason why the IHF (CSG) cannot restructure itself in the manner planned, and continue in existence in this new form rather than dissolving? If not, why not?

3. Will the clause in the (CSG's) IHF's Certificate of Incorporation stating that in the event of the CSG's dissolution, its assets are to be distributed to the LPWS still be in force once the restructuring is complete, and does this present problems to the restructuring? An investigation into the books, validity of the books, a check with the accountant hired by IHF and a check into the tax status may become important to the investigation as well at this point.

4. And, finally, I think it is essential to once and for all document the history behind this affair, for party history and for a final resolution to the animosity between members of the State Executive Committee and others involved.

Should the committee today see fit to formally sanction this and authorize repayment of your incurred expenses, my thanks to you in advance for heading this up. I will await your report to the committee when the investigation is complete. I would like to ask that every effort be made to resolve this by the end of 1989.

Sincerely,

Marla Bottemiller
State Chair
Libertarian Party of Washington State

Principal contacts will include: Ruth Bennett, Tom Tanaka, Tina Carter, Jack and Karen Allard, Rich Shepard, Tom Olson, Kim Peddicord, and David Jones. Phone numbers available upon request.

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Attachment A3

LIBERTARIAN PARTY OF WASHINGTON STATE

Richard Shepard, Campaigns Chair
1107 1/2 Tacoma Avenue South
Tacoma, Washington 98402
(206) 627-3545

August 14, 1989

Marla Bottemiller, State Chair-LPWS
14150 S.E. 17th Place, #B7
Bellevue, WA 98007

Dear Marla:

Two years have passed since the National LP Convention was held in Seattle. Since then I have heard virtually nothing about the activities of Convention Services Group (CSG), the "non-profit" organization formed to produce the convention. I am concerned about this lack of information, and whether any funds remain.

Now, I am fully aware that, coming from me, this will sound something like "sour grapes". Let it suffice to say that, after putting eight months as a paid employee into the convention, I was fired by CSG for alleged incompetence and insubordination. My mistake, I think, was in refusing an equal voting position on the CSG Board of Directors at the outset, when it was offered.

Setting my own resentment aside for a moment, I would like to point out a few things:

1) The franchise for the national conventions has usually been given to a state party, to discharge, assign, or subcontract as it saw fit. For reasons of liability, the LPWS chose to assign its franchise to CSG, and the verbal agreement between the LPWS and CSG was never written down. By that decision, the LPWS lost much of its "leverage" with CSG.

2) Nevertheless, the original plan was that as soon as the convention was over and all the bills paid, then CSG would dissolve itself and contribute the assets to the LPWS general treasury. When I wrote the Articles Of Incorporation for CSG I specifically recited this goal. A year after the convention Karen Allard formally requested that CSG "wrap things up" and present a report to the LPWS. If one was presented, I never saw it.

3) The NLP also failed to obtain a contract from either the LPWS or CSG. Negotiations went right on down to opening day of the convention. I have my opinions about who was being unreasonable, and frankly, what I did with those opinions was what got me fired, and, apparently, the abiding enmity of certain members of the LPWS. No contract was ever signed.

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4) To my knowledge, two Libertarians presently compose the Board of Directors of CSG, and no other Libertarian, except perhaps an accountant in his official (and hence, confidential) capacity, has ever seen CSG's books. Convention profit estimates by outsiders run as high as $20,000.

Recently I have heard that CSG has now changed its mind about dissolution, and intends to reform as a PAC. It may be that I have my facts wrong, and there is no cause for concern. After all, CSG did donate the filing fees for all of the LPWS candidates last year.

However, many Washington Libertarians donated their time and energy to the convention, as ticket takers, registration assistants, office helpers, etc. After two years, they still have no idea whether their assistance made any difference, or what happened to the proceeds. I think that these party members have a right to know.

I believe that reformation of CSG into a PAC was not within anyone's serious contemplation when it was originally formed, and, without knowing more, I am opposed to it. The convention proceeds, if any, where to be used by the LPWS as it saw fit. Whether or not CSG does reorganize is a matter about which I think the SEC, if not all those who worked on the convention, should be fully advised. Those who contributed to the production of the convention should have a part in the decision as to which option(s) are taken.

I would appreciate hearing from you at your earliest convenience regarding this matter.

Sincerely,

RICHARD SHEPARD

cc: Michael Dunn
SEC members

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Attachment A4

LIBERTARIAN PARTY OF WASHINGTON STATE

Richard Shepard, Campaigns Chair
1107 1/2 Tacoma Avenue South
Tacoma, Washington 98402
(206) 627-3545

September 5, 1989

Ruth Bennett
President, CSG
43 Broadway, #2
Tacoma, WA 98402

Re: The "new" CSG and its relationship to the LPWS

Dear Ruth:

As you may have guessed, I still have questions about the "new" CSG. Let me be clear, a local libertarian educational foundation is encouraging. In the appropriate circumstances such a foundation will have my full support. Nevertheless, my questions nag. Please allow me to explain:

1.) All of the "new" CSG's current assets came from an official Libertarian Party function.

2.) But for the LPWS's consent, for which, to my knowledge, no consideration has been paid (Last year's filing fees were a "donation".), CSG would never have produced the 1987 Convention.

3.) Except for a few who had some status within CSG, virtually all work in the 1987 National Convention was done by individual LP members who had nothing to gain but the satisfaction of knowing they had aided "the Libertarian Party".

4.) Originally CSG was to be a corporation of limited duration, lasting one year. The original Articles of Incorporation for CSG specifically called for the contribution of all assets to the LPWS upon the dissolution of CSG.

5.) When I drew up the Articles, I argued against a limited duration corporation because things could have, and evidently did, take longer to complete than the one year ordinarily set aside for limited duration corporations. So CSG became a corporation of unlimited duration. No one, to my knowledge, anticipated that CSG would last into perpetuity without some sort of review by the LPWS.

6.) So far, the only information released by the "new" CSG consists of a one half page "memorandum" setting forth the general purpose of the organization, the names of the current officers, and the amount of cash on hand. No revised corporate charter, by-laws or policy statements reflecting the "new" plans have been presented to the LPWS for review, or, apparently, even exist.

7.) That some of us within CSG were, or are, also LPWS members is technically irrelevant to the legal relationship of the two. Unless CSG in some way acknowledges the LPWS's purpose and goals, LPWS influence over the activities of CSG may be nil, a result that I am sure was not within <u>anyone's</u> contemplation three years ago, and certainly a result contrary to the original plan.

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Further, as I understand the "tax situation" relating to the LPWS and CSG, both organizations are, themselves, tax exempt. The only difference in tax liability rests with those who make contributions to either entity, a greater deduction being available to those who contribute to "an educational foundation" as opposed to a "political organization". The incentive on the part of individuals will then be to contribute first to the "new" CSG, and second to the LPWS. I believe that fact was not adequately discussed at the last SEC meeting.

I want to be clear that I am not accusing anyone of wrongdoing, nor do I have any information which causes me to believe that funds are being handled in anything but an appropriate fashion. My point is that the LPWS has no information. Neither do most of the people for whose benefit the money was supposedly "earned". Quite frankly, I believe the SEC may be negligent in discharging its dutys to the "rank and file" members of the LPWS if it does not demand more information from CSG.

Therefore, in my capacity as a member of the LPWS-SEC, I am requesting the following information from CSG:

a) Copies of any and all documents relating to the purpose, formation and structure of the "new" CSG, including but not limited to By-Laws, Articles of Incorporation, Policy Statements, Public Relations releases or pamphlets, Statements of Purpose, rules of internal procedure, and meeting minutes.

b) Copies of profit and loss statements, balance sheets, and tax returns for each year of existence, and CSG check registers, bank statements, and any and all documents prepared for CSG by its accountant(s).

Finally, I want to be clear that I see a lot of good reasons for the establishment of a separate educational foundation. I am simply not comfortable with the idea of letting it occur when so many questions about the scope and purpose of the "new" CSG remain to be answered, and the relationship, whatever its final complexion, of the LPWS and CSG is not more clearly defined. If CSG is confident in its chosen course, then it should have no reason to resist an open inquiry into its working documents and internal structure by those who helped "build the nest egg" (e.g. the LPWS).

I shall be pleased to discuss any or all of the foregoing with you, should you wish to call.

Sincerely,

RICHARD SHEPARD

cc: SEC members
Michael Dunn

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APPENDIX B

LPWS SEC MINUTES CONCERNING THE 1987 SEATTLE LP CONVENTION

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ST[redacted] CENTRAL COMMITTEE MEETING

September 17, 1983 * * * * * Seattle, WA

Members Present:

Tomm Spanos, Chairman
DeAnn Pullar, Treasurer
Skip Barron, At-Large
Clark Rarig, King County

Members Arriving Late:

John Trinnes, Secretary

Members Absent:

John Doherty, Vice Chair
Michael Dunn, King County
James Martin, At-Large

Call To Order Report: The meeting was called to order at Skip Barron's home. The secretary was absent/late. The following minutes report only those items that occured after the secretarys arrival.

L.P. AIDS Fund Raising Project: A report/discussion of internal controversy at the national level of the L.P. over what appears to be attempts to control and profit from injecting the Libertarian Party with what this secretary calls its own case of AIDS, led to a general discussion on how to inject the same into the WSLP, while not really appearing to do it. Several resolutions were offered; several resolutions got bogged down. For the third meeting in a row, the matter went unresolved.

Convention & First NatCom Meeting Report: Skip Barron gave a report on the national convention and first NatCom meeting. Included was a report on NatCom delegate rules changes. Mr. Barron also reported that National HQ is moving to Houston Texas, while the telephone fund raising office and a small liaison staff office will remain in Washington D.C. A resolution passed to have L.P. National funds used to pay Paul Grant (of Denver, Col.) and outgoing party auditor Dave Walter's travel expenses to Houston, Texas. Mr. Barron said that the two had actually asked for expenses to Washington D.C. as well as Houston. Mr. Barron voted against the expenditure.

Future NatCom meetings are scheduled for the first weekend (give or take one weekend) of Der '83
Apr '84
Aug '84
Dec '84
Apr '85

Mr. Barron submitted a bid for the August '84 meeting to be in Seattle.

Seattle '87: As a result of prior discussion and arrangements made during the last meeting, and completion of preliminary research by Skip Barron during the past month, it was moved and passed that:

H. Barron Enterprises be authorized by the L.P.W.S. to bring the 1987 L.P. National Convention to Seattle. Procedes from any moneys raised from the convention and NatCom meetings held in Seattle before the convention will be split 50/50% after expenses between the L.P.W.S. and the H. Barron Enterprises. Subject to contract approval by the L.P.W.S.

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Other Business:

John Trinnes announced that James Martin had resigned from the state central committee and his position as Pierce-Thurston L.P. chairman. It was also pointed out that Mr. Martin had missed three consecutive meetings, and would have had to surrender his At-Large position to an alternate anyway. Mr. Spanos said he would look into who the alternate would be.

It was moved and passed that the L.P.W.S. would purchase the Libertarian Comic Book negatives from the L.P. of Texas. A sample comic Book was passed arround for inspection.

It was moved and passed that the L.P.W.S. appoints Paul McGreenery to act in the name of the party in accordance with state law to develope a list of voters and non-voters in the state of Washington for party purposes.

Next Meeting: It was decided that the next the next S.C.C. meeting of the L.P.W.S. would be held at 1:00 p.m. on the third Saturday of October (10-15 83), on Tomm Spanos' boat.

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LIBERTARIAN PARTY OF WASHINGTON STATE
EXECUTIVE COMMITTEE
MEETING MINUTES. OCT 25. 1986

The October 1986 meeting of the LPWS Executive Committee was held in Tacoma at the Allard residence on Saturday, the 25th. Members of the Committee present at 1:00 on call to order were: Tom Olson, Chair; Karen Allard, Pierce County Representative; David Jones, Campaigns Chair; and Tom Tanaka, King County Representative. Members absent were: Tina Carter, Membership Chair; Jim Hills, Spokane County Representative; and Kim Fedderson, Finance Chair. Others present were: Ruth Bennett, President of Convention Services; and Greg Allard, Observer.

The minutes were read and approved.

Tom Tanaka reported on membership in the absence of Tina Carter. He updated the committee on the response to the last membership letter sent out. Ruth noted that February 1st was the deadline for membership reports for delegate count at the 1987 Convention, and suggested that an insert be included in the Washington Libertarian and that it be sent to the general mailing list.

Campaigns this year consisted of Karen Allard's race for State House and Jack Allard's non-partisan race for County Charter Review Committee. Pierce County also had a ballot measure on land use regulation that many Libertarians were working against.

Tom Olson reported on the financial situation in the absence of the Finance Chair. He announced an available balance of $279.37 in the bank account. He said the party had reaped a $2 dollar profit from the Marshall Fritz Black Belt Session.

Tom Tanaka announced that the next newsletter would sport a new look in that the masthead design had been overhauled. He said the name would be changed to The Northwest Libertarian. Response to this announcement was favorable and discussion centered on the possibility of merging newsletters with Oregon and or Idaho and even British Columbia. Tom presented a bill for expenses and income checks for ads, etc. He announced deadlines of November 5th and December 5th for the next two issues.

Pierce County Representative Karen Allard reported that their organization had held a fundraising garage sale and had ratified a new charter based on King County's version.

King County Representative Tom Tanaka reported no meeting due to the Marshall Fritz events. No other activity was reported.

It was moved that "The LPWS officially recognizes LP Convention Services as the official entity responsible for producing the National Libertarian Party Presidential Nominating Convention in September of 1987." The Motion passed 4-0.

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Ruth announced that there had been a disturbance at the NLP over Karl Hess' publishing an ad by the Radical Caucus. Since Hess' position as LP News editor was at issue, and since the response of the Committee to this news was one of support for Hess, David Jones volunteered to draft a letter in support of Hess and to send it to the NatCom. No objection was voiced.

Skip Barron arrived.

It was moved and seconded that Skip Barron be removed from any position regarding the 1987 Convention. The motion passed 4-0 and a letter was given to Skip formally establishing that position.

10-25-86

To: M. W. Barron
From: LPWS Executive Committee
Re: 1987 National Convention Project

****

Dear Mr. Barron:

This is to formally notify you of termination of any position, express or implied, you have held with regard to production and/or direction of the 1987 National Libertarian Party Presidential Nominating Convention.

Tom Olsen
State Chair

_____
David Jones
Campaigns Chair

_____
Tina Carter
Membership Chair

_____
Kim Peddicord
Finance Chair

Skip submitted an invoice for expenses to date totalling $686.70. He also submitted a form to release him from duties under what he called a contract with LPWS. The Ruth stated that the committee's position was that there had never been a contract with Skip, hence no release was necessary. Skip then recounted

his work up to present and announced that he would require remuneration of $2500 or $1500+10% of net convention proceeds. No counter-offer was made by the committee but Ruth assured Skip that one would be made after consideration in closed session. Skip also noted at that time that he had committed the party to giving Paul Jacobs and his wife each full convention packages.

Questions were raised about the status of Whatcom, Spokane, and Kitsap organizations. No specific activity or plans were announced, but Cliff Lasnetske in Bremerton had expressed interest in forming a Kitsap organization.

Adjournment was accomplished at 2:10 pm after setting the location and time of the next meeting at Tom Olson's residence at 1:00 pm on the 15th of November.

Respectfully Submitted,

David Jones
Secretary

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LPWS EXECUTIVE COMMITTEE
MEETING MINUTES
11-15-87

The November 1986 meeting of the LPWS Executive Committee was called to order at Tom Olson's residence at 1:10 PM. Committee members present were:

Tom Olson	Chair
Karen Allard	Pierce Co Rep
Tina Carter	Membership Committee Chair
Tom Tanaka	King Co Rep
David Jones	Campaigns Committee Chair
Kim Peddicord	Finance Committee Chair

There was no representation from Spokane County and the position of Communications Committee Chair remained unfilled.

Other people present were:

Greg Allard	Observer, Pierce Co
~~Skip Barron~~	Observer, King Co
Mimi Leyba	Observer, Pierce Co
George O'Brien	Observer, Pierce Co
Martin Buchanan	Observer, Oregon LP

An agenda was presented by Tom Olson and the minutes of the previous meeting were read and accepted.

Campaign activity was reported. Karen Allard recieved 2.8% of the vote in her run for the state house. Jack Allard received 46% of the vote in a non-partisan race for Pierce Count Charter review. The Pierce County land use measure failed. It was also noted that De Ann Pullar received 28% of the vote as a Republican running for the state house.

Tina reported her count of State party members at 78. She expressed displeasure regarding the way the phone message-response arrangement was working.

Tom Tanaka said the newsletter labels were wrong - that the updates were not being printed. Some discussion followed about why this situation existed.

Kim reported a bank balance of 224 dollars and one outstanding bill for telephone service of 35 dollars.

No county activity was reported in King County.

Pierce County is ordering literature from Orpheus Publications and Karen Allard asked if other regions wanted to pitch in for a lot. They also will purchase some of Berglands LIBERTARIANISM IN ONE LESSON and extra copies of the LP NEWS outreach issue.

Skip Barron asked the committee to ratify him as Representative to NatCom. The Committee did so by voice vote. This vote was later reconsidered and Skip was replaced by Ruth Bennett, who had been credentialized at the last NatCom meeting.

Skip then asked the committee to make a statement regarding his contention that a contract has existed between him and LPWS. The committee took no action. He stated that his recourse was to the Judicial Committee if the LPWS considered there to be no contract. He also stated that he wanted to have an offer from LPWS to buy him out of the LP Convention Directorship by the end of the month and a decision by the end of the year.

No offer was tendered at the meeting.

Mimi Leyba announced that a group of Libertarians at Evergreen College were interested in starting a chapter.

Tom Olson noted that according to the Party By-Laws the State Convention Committees were to be set up by the December meeting. Tom Tanaka expressed an interest in being on the platform committee.

Tom Olson then announced his resignation as of december's meeting and Kim's resignation effective immediately. Thanks a lot, eh. Take off, ya hoser.

The meeting was adjourned to the Allard residence in Tacoma on the 20th of December at Noon. This meeting venue was later changed to the Olson residence at 1:00PM.

2204091391 2

Minutes of the LPWS State Executive Meeting
January 24, 1987

Members in attendance:

Dave Jones, Acting Chair
Tina Carter, Membership Chair, Acting Secretary
Margot Hamilton, Communications Chair, Treasurer
Tom Tanaka, King County Representative

Meeting called to order 1:24 pm. A pause was taken at 1:25 to call Ruth. The meeting continued ten minutes later.

Minutes of the last meeting were distributed.

Finances

Margot distributed a listing of all the entries in the ledgers in order to determine which money was the property of LPWS and which belonged to LPWS Convention Services Group. The mysterious entry called "SAG" was identified as coming from the Black Belt seminar presented by Marshall Fritz in October.

A check for $654.20 was presented to CSG from LPWS, thereby disconnecting the two organizations financially.

We received the tax forms from the state. These will be worked on in the near future.

Newsletter

A discussion ensued about itemizing the newsletter's costs in order to distribute money received to specific issues. As this has never been done before, it was considered quite revolutionary.

Dave brought up the possibility of making the newsletter an independent business, however, several objections were voiced. The newsletter editor would have to devote much more time to it and the LPWS would have no longer have this to offer to it's members.

Tom reported that the next issue of the Northwest Libertarian would come to $110. This includes a $40 renewal of the bulk permit.

Phone

The papers for installing the phone were filled out and signed by Tina, Dave and Margot. Dave and Tina were listed as the only two people who can make changes to the line. Tina will send the papers and a letter this coming week.

Membership

There are now 87 state members.

Regions

No one attended from Pierce county.

No one attended from Spokane county, although Tina had been notified of this by Loretta Czap.

King County had a meeting. Rich Shepard came as did Howard Cherry. The latter will organize and sell exhibit space for the convention. Walter Block will be in Seattle at the UW 1/29 and 1/30. Conversation drifted off to explore what might constitute exhibit space at the Sheraton.

Old Business

Natcom Rep - We need to confirm with Ruth if she is or is not interested in continuing as rep.

It was suggested that we disband the region if Oregon doesn't have anyone interested and if Ruth is not interested in the job.

New Business

Tom's chart on Liberty bucks was distributed and discussed. Tom is making an ad for the LP news after the January edition on liberty bucks. There was much talk about the convention in general.

Adjournment

Next meeting will be held at Harvey's Chinese Restaurant in Renton. Directions and time are forthcoming.
Meeting was adjourned at 4:29 pm.

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CONVENTION SERVICES INCOME

Date	Description	Amount
[illegible]	Thomsen, E. (for Liberty Suites)	[illegible]
	Feltner, C. " "	[illegible]
[illegible]	[illegible] (LPWS Help [illegible] for CS expenses)	[illegible]
[illegible]	Reilly, S. (for Liberty Suites)	[illegible]
[illegible]	Conway, P. " "	[illegible]
	Longerbar, C. " "	[illegible]
	Saum, D. " "	[illegible]
	Clinard, F. " "	$230.00
	Ayres, S. " "	$236.00
	Lemotske, J. " "	$240.00
	[illegible] " "	[illegible]
	Hamilton, H. " "	[illegible]
[illegible]	Heaton, J. " "	[illegible]
[illegible]	Total Convention Services Income	$3128.00

AMOUNT LPWS PAID TO CS

Date	Description	Amount
[illegible]	Total CS Income to date	[illegible]
[illegible]	Total CS Expenses to date	[illegible]
[illegible]	Amount LPWS paid to CS	$654.20

CONVENTION SERVICES EXPENSES

Date	Description	Amount
11-01-86	H.W. Barron - LP 1987 Expenses	[illegible]
11-15-86	UPS - ad for [illegible]	[illegible]
12-29-86	Rich Shepard - [illegible].00 salary	[illegible]
	Money order for state permit	[illegible]
1-07-87	Rich Shepard - salary thru [illegible]	[illegible]
	Tom Tanaka - CS advertising	[illegible]
1-17-87	CK Graphics - Scrip printing	[illegible]
1-[illegible]-87	**Total CS Expenses**	**$2473.80**

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LP 1987 EXPENSES PAID BY H.W. BARRON

Date	Description	Amount
9-05-86	C. K. Graphics- Printing	[illegible]
9-[illegible]	Tom Tanaka - Deposit on printing & ad prep	[illegible]
9-[illegible]	Norm O'Keefe - Ad & scrip proj	[illegible]
	Total Expenses paid by Barron	**$686.70**

LPWS INCOME FOR 1986

Quarter	Memb.	Contrib.	Misc.	TWL	Total
Jan-Mar	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Apr-Jun	[illegible]	$210.00	[illegible]	[illegible]	[illegible]
Jul-Sep	[illegible]	$27.00	[illegible]	[illegible]	[illegible]
Oct-Dec	[illegible]	$45.00	[illegible]	[illegible]	[illegible]
Year	$1180.00	$595.00	$129.00	$230.82	$2134.82

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Attachment 85

LPWS State Executive Meeting Minutes

June 20, 1987

Karen Allard's house

Attending:
Karen Allard Chair
Dave Jones Campaigns chair/computer
Art Rathjen Communications chair
Margot Hamilton Finance chair
Tina Carter Membership chair/temporary secretary
Tom Tanaka King County rep/Newsletter
Rich Shepard Pierce County rep

Call to order 12:22 pm.
Minutes of previous meeting passed with correction included regarding Dave's contact with DeAnn Pullar over the LPWS mailing list and her conference.

F240713918

Officer's Reports
Chair

Karen checked with national when several people did not receive their LP News. They said their list was in order and they put in a formal complaint with the Post Office.
SEC names were sent to National by Karen.
Tom Olson called Karen and told her he is still receiving chair info. She will ask him to forward all chair info. to her.
Karen sent DeAnn a letter asking her to provide her lists from her conference and return our mailing list.
She also called Mike Dunn regarding the judicial committee. She made a list of all the committee members and and is setting up a meeting of the committee for 1/2 hour before the Ron Paul barbeque on June 27. Dave suggested that it would be prudent for committee members not to talk to Skip because of what he may bring a case to the committee. Karen will tell Mike to call judicial committee members and ask them to meet 6-27. Karen will not be involved with the committee because she may be a witness.
Karen sent a letter to the P.O. telling them that Tonie Nathan can use our mail permit number.

Campaigns

Dave spoke to the lead presidential candidates. We need to set up an organization to deal with campaigning for whoever is nominated. Jack is working on a referendum on repealing state officials' salary increase. Ed Phillips from Mossy Rock, WA (206) 983-3359 wants to help with this referendum also.

Finance

Financial reports will now be year-to-date. We have $274.03 in the bank. We lost $12.80 on the Russell Means luncheon.

Membership

We have 92 state members.
The Wanderer's mail box will stop mid-July. Margot will notify the bank of the change of address and Tina will notify the phone co.
All LPWS bills will now be paid by the LPWS, not CSG. LPWS will give CSG receipts for bills previously paid, and Tina will give Margot copies of these bills. Tina will send Margot the current phone bill.

Communications

Art will be sending press releases on all LPWS events. He is also sending letters to people who call on the LPWS phone. One such is Randy South who wants to help out in the campaigns area. Art is telling people that they'll receive a copy of the N.L. Art is also trying to get Jim Hills' eastern WA media list. He is trying to get a list of rotary clubs from Will Hafer, and Karen is giving him a list of service clubs. He is trying to get a list of speakers from Sandy Blondell from Fritz for a speaker's bureau. Art will be helping Tonie with media for the convention.
Art will keep a list of contacts from the LPWS phone. As people become members, he will drop them from his list, as Dave will have them in his data base. He will send them a follow-up letter if they show no interest, then drop them from his list. These may go into our large computer list. Dave got a list of interested local people from National which he gave to Art.

Meeting broke for a short time at 1:00, reconvened at 1:14.

2040139

King County - nothing to report
Pierce County - nothing to report
Spokane County - they will be coming next weekend to Ron Paul barbeque

Incorporation
According to Rich, incorporation is not necessary to move the money from CSG to LPWS. The average filing fee for this is $25 - 35. Incorporation, however, will not help our liability. The LPWS will be able to be sued but if they have no money, there will be nothing for which they can be sued. Skip will have to sue each person who was on the SEC at the time of the decision. Incorporation might be a deterrent from him bothering the LPWS as currently constituted. CSG is under no obligation to LPWS. It can maintain itself and donate money as desired to LPWS.
If LPWS incorporates and takes the money, Skip will have to sue the individuals. If the individuals made no profit, he cannot justify the suit.
Dave will give Karen copies of papers regarding Skip.
We should incorporate for future possible problems. There was general agreement that this would be a good idea.
CSG would protect the money so LPWS would like to see CSG keep its books open until this decision is made.
LPWS incorporated will be a membership organization.

State Convention
There was a small financial loss. Also, the media for the convention cost Karen $57.00. She will hold on to her receipts until she decides whether or not she wants to reimbursed.

Marshall Fritz' visit
17 people came, 4 from Canada. It went fairly well.

Convention Delegates
Kelly Haughton received the list of delegates from Tina, who also sent a list to Dean Ahmad.

Convention exhibit booth
Karen is submitting a proposal to CSG which will request that CSG pay for supplies because we don't have enough money to pay for them and also because we will have to accept Liberty Bucks in payment.

Ron Paul Barbeque
Set for Saturday, 6/27, 5:30 pm at Karen's. Tonie was in contact with the P.I.'s and the T.N.T.'s editorial boards.
After the barbeque the delegates and alternates will meet to discuss the future of the party, Natcom Rep and the National Chair, etc.

Motion: LPWS support referendum Measure 45 that reads "Shall the proposed salary increases for the state elected officials be repealed?"
Seconded.
Motion automatically put on orders from the day for next meeting.
Motion: We place on the agenda for the next meeting consideration of endorsement of the ballot measure to sue the Federal Reserve.
Seconded.
Motion automatically put on orders from the day for next meeting.

Adjourn 1:54.

2204021392 1

Attachment B5

PROFIT AND LOSS STATEMENT

Jan[illegible]y thru June (Reported 06-20-87[illegible])

ACT	ACCOUNT NAME	BALANCE	SUBTOTAL 1	SUBTOTAL 2
	Income accounts			
200	National Membership	40.00		
205	State Membership	154.00		
209	Natl + State Membshp		194.00	
214	King County	12.00		
218	Pierce County LP	4.00		
222	Spokane County LP	2.00		
229	County Membership		18.00	
230	Contributions	52.00		
231	Pledges	90.00		
239	Total Donations		142.00	
240	Newsletter	113.70		
250	State Convention	479.06		
260	National Convention	2,188.00		
290	Misc. Income	32.10		
	Total income			3,166.86
	Expense accounts			
304	King County LP	0.00		
308	Pierce County LP	0.00		
314	Spokane County LP	0.00		
319	County Membership		0.00	
320	Telephone	97.00		
321	Mail Service	50.00		
328	Misc. Communic. Exp.	0.00		
329	Total Communications		147.00	
330	Newsletter	116.89		
340	Administration	9.00		
350	National Membership	40.00		
355	Pledge Solicitations	0.00		
360	Campaign & Elections	0.00		
370	State Convention	491.86		
380	National Convention	2,190.30		
390	Misc. Expenses	0.00		
	Total expenses			2,995.05
	Net profit			171.81

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Washington Libertarian Party
PROFIT AND LOSS STATEMENT
January thru June (Reported 06-20-8[illegible])

ACT	ACCOUNT NAME	BALANCE	SUBTOTAL 1	SUBTOTAL 2
	Income accounts			
200	National Membership	40.00		
205	State Membership	154.00		
229	County Membership	18.00		
	Total Membership		212.00	
230	Contributions	52.00		
231	Pledges	90.00		
239	Total Donations		142.00	
240	Newsletter	113.70		
250	State Convention	479.06		
260	Nat. Convention (Net)(1)	00.00		
290	Misc. Income	32.10		
	Total Income			978.86
	Expense accounts			
350	National Membership	40.00		
319	County Membership	00.00		
	Total Membership		40.00	
320	Telephone	97.00		
321	Mail Service	50.00		
329	Total Communications		147.00	
330	Newsletter	116.89		
340	Administration	9.00		
370	State Convention	491.86		
380	Nat. Convention (Net)(1)	2.30		
	Total expenses			807.05
	Net profit			171.81

(1) In this report $2,188.00 was subtracted from both the National Convention Income and the National Convention Expense (bookkeeping) accounts. The National Convention finances were only put into the LPWS Bank Account because of the delay in getting a separate Bank Account for the National Convention. This version of the Profit and Loss Statement was done in order to make it easier to see what is happening to the LPWS finances, without the distortion of the totals by the large amounts involved in the National Convention finances.

2240213923

Attachment B5

BALANCE SHEET STATEMENT
January thru June (Reported 06-20-[redacted]

ACCT	ACCOUNT NAME	BALANCE	SUBTOTAL 1	SUBTOTAL 2
Asset accounts				
[illegible]	[illegible] Account	274.03		
	Total assets			274.03
Liability accounts				
100	Prepaid Membership	0.00		
Capital/Equity accounts				
150	Equity	102.22		
189	Net Equity		102.22	
160	Retained Earnings	171.81		
	Total Liab/Equity			274.03

[redacted]

Washington Libertarian Party
LOCKDOWN STATE CONVENTION
(Reported 06-20-87)

ITEM	AMOUNT	SUBTOTAL 1	SUBTOTAL 2
Income			
Payments for 22 Lunches	453.00		
Lit. Sale + Donations	26.06		
Total Income			479.06
Expenses			
18 Salmon Lunches (@$13.95)	251.10		
6 Rib Lunches (@$10.95)	65.70		
Total Lunches (24)		316.80	
Marina Room	75.00		
Bartender Fee	20.00		
Sales Tax	32.54		
Gratuity	47.52		
Total Other Exp.		175.06	
Total expenses			491.86
Net loss			12.80

Note: There were 24 lunches served and 22 lunches paid for because we gave lunches to Russell Means, Andre Marrou, and Tonie Nathan. And Ruth Bennett paid for one person who did not come.

2240213925

LPWS State Executive Meeting Minutes

July 18, 1987
Tina and Tom's house

In attendance:
Karen Allard Chair
Dave Jones Campaigns chair/computer
Art Rathjen Communications chair
Margot Hamilton Finance chair
Tina Carter Membership chair/temporary secretary
Loretta Czap Spokane County Rep
Tom Tanaka King County rep/newsletter
Rich Shepard Pierce County rep
Jim Hills observer

Call to order 12:07 pm.
Minutes read although they are disorganized.
Motion: To postpone acceptance of minutes until they are published and read at the next meeting.
Seconded.
Friendly amendment: add: though we'll discuss the corrections today.
Passes.

Rich had a correction, that the LPWS will be open for suit if it incorporates, but if they haven't any money they won't have any money to be sued for.

Officers' Reports

Chair

Mike Dunn was not contacted by Skip.
Karen spoke to DeAnn who said she'd definitely come down for the CSG volunteer meeting and at that time would bring the list she owes us. She never showed up and has not sent the list either. She said her list of attendees went to WWU and since she's not involved with them now, she can't get the list back.
Karen also called Alaska LP. The delegates received a package of info from Joe Dehn about a possible merge of the region. We have until the close of the National convention to change our region. Please see attached excerpt from Joe's letter.**
Karen gave Art a list of meeting spaces in the area and Lakewood service clubs.

Campaigns

2040713926

Not much is happening, no one will be running this year as we have missed announcement dates.

Finance
Our current balance is $798.99.

Membership
There will be a letter going out in a couple weeks. Copies will be available for the LPWS booth at the conventions. Memberships continue to trickle in.

Communications
Art got a mailing list for Indian tribes in the area. He sent it to Tonie via Joe Dehn.
Still writing to people to call into machine. He's donating stamps, etc.
When Art finds a libertarian letter in the paper he writes a letter to the letter's author in support of his/her position.
He wrote the League of Women Voters asking that our name be added to their directory. Jim/Loretta will give him their Spokane address and he will write to them also.

Newsletter
Next N.L. will be out in a couple weeks. It will be Laser printed by Bill Broadford. It will contain 6 ads, the most in any previous issue. One ad will be a full page ad for Bill's new magazine, in return for printing the newsletter. This will be the July/August issue. The deadline for the Sept. issue will be Sept.6.

King County nothing to report except work on convention.
Pierce County Sharon Blandings called expressing interest in doing a supper club. They are considering putting on a picnic.
Spokane County They've had no formal meeting but they are working on contacting people through the convention list they got from Rich.

Old Business
Motions from last month:
WA state senate bill 5444
Motion: We all get copies of all the information on SB 5444 and referendum 45 and read it in the next month and vote on it next month. Motion withdrawn.
SB 5444 Read aloud by Dave.

Motion: The SEC of the LPWS endorses SB 5444 as a constructive step toward toward the abolition of the Federal Reserve system.
Seconded.
(Rich's) Motion: The SEC of the LPWS endorses SB 5444 as a constructive step toward the abolition of the Federal Reserve system toward the resurgence of state and individual rights.
Seconded.
Rich's Motion withdrawn.
Motion: to break for 10 minutes for work on above resolution.
Seconded. Passed.
Motion: That copies of all the information on SB 5444 be given to everyone here and any other members of the SEC and that on July 25th the state chair poll the SEC members for a vote on: it is then resolved 1. That the SEC endorse SB 5444 as a reflection of the LPWS platform "We affirm the rights of individuals to establish a society of free people who trade, associate, and act according to their individual judgements and desires." and "Money is a unit of value for facilitating exchange. It is impossible for exchange to be free while its medium is controlled; the parties to an exchange are the only rightful determinants of its conditions. We therefore call for the repeal of all legal tender and fiat money laws, and an end to the regulation of finance and investment." 2. That the SEC commit LPWS resources to working for the passage of SB 5444 to wit 1. the campaigns chair will contact "Honest money for America" to coordinate efforts toward the passage of SB 5444 2. the communications chair shall publicize SB 5444 in a mailing to those on the party's mailing list encouraging their support.
Seconded.
3 in favor, 2 against, 2 abstentions. Passed.
Motion: to endorse Referendum 45. Seconded.
0 in favor, 3 against, 2 abstentions. Fails.

The judicial committee met before the Ron Paul barbeque. Karen will not have to represent the LPWS, as individuals will be called to testify on specific points. Upon a list of charges from the judicial committee the SEC will present a defense.

70 people came to the Ron Paul visit. He also did a radio interview which was not too good because the interviewer let the callers talk on and on. We had a $210.00 profit on the event.

Convention update - everyone's working very hard.

2204913928

Dean Ahmad's letter to Tina was read requesting our plan on replacing delegates with alternates at the convention. Alternates will be votes on in order by a majority vote. This should be in the rules. Tina will send Dean a letter with that information.

Karen did one service club speech and Ted Ross did 3. Ted's is non-political, Karen's is completely political. They've had different responses. Karen will get copies of Ted's speeches to Art.

We don't need to incorporate at present. CSG will do with the money as it sees fit. It's LPWS' duty to apply for the money and convince CSG that they are worthy of the money. This will be continually put on the agenda.
At the Convention booth, we'll be selling key chains, and other extras CSG isn't going to give out, ie., pens, notebooks, mugs, and literature. Maybe also the membership letter and the platform.

2040213929

New Business
Tina will give Karen a copy of the state convention minutes, Dave will give her a copy of the newly revised Constitution and By-Laws.

Dave Walters has proposed National By-Law/Rules changes including that there be reimbursement of the regional reps, and that there may not be regional reps but 10 at large members who each are on a committee. Joe Dehn has sent a letter regarding this to all WA and OR delegates. Karen is writing her own changes, for example, a title and specific responsibility be assigned to each as in our SEC.

Margot spoke about her ideas that the Natcom should meet more often by computer.

Karen has many copies of audio tapes and some video tapes, for people to borrow.

After the convention, Karen will try to put together a network so people can access libertarian services and businesses.

Motion: that the SEC of the LPWS endorse initiative #1 which states: "Shall Bellevue City Code Chapter 1.12 be amended to add a new section providing that any decision of the City Council to offer financial or economic incentives to professional sports franchises, in order to entice them into locating or relocating in the City of

Bellevue, shall be subject to initiative and/or referendum, except as precluded by state law."
Seconded.
Automatically on orders of the day for next month.

Motion: to adjourn to meet noon in Pierce County on 8/16, before the Pierce County picnic.
Passed.

2240711393O

Attachment B/

APRIL 2, 1988

CONVENTION SERVICES GROUP
C/O RUTH BENNETT, PRESIDENT
43 BROADWAY
TACOMA, WA. 98402

DEAR RUTH,

THE 1987-1988 TERM OF THE STATE EXECUTIVE COMMITTEE FOR THE LIBERTARIAN PARTY OF WASHINGTON STATE IS COMING TO A CLOSE AND NEW OFFICERS WILL BE CHOSEN ON APRIL 30TH. THE LPWS EXECUTIVE COMMITTEE WANTS TO TAKE THIS OPPORTUNITY TO THANK THE CONVENTION SERVICES GROUP FOR A GREAT CONVENTION. WITHOUT ALL YOUR HARD WORK, THE CONVENTION WOULD NOT HAVE BEEN A SUCCESS.

AS CHAIRMAN OF THE LPWS, I HAVE A REQUEST TO MAKE OF THE CSG. I WOULD LIKE THE CSG TO TAKE THE REMAINING WEEKS BEFORE THE STATE CONVENTION TO SETTLE ALL THE UNFINISHED BUSINESS. MANY OF US NOT ON THE CSG BOARD ALSO SPENT MUCH TIME ON THE CONVENTION AND WOULD LIKE TO SEE THE LPWS HAVE ACCESS TO THE CONVENTION PROFITS FOR LPWS CANDIDATES AND OTHER APPROPRIATE PROJECTS.

I WOULD ENCOURAGE THE CSG TO TRANSFER THE PROFITS TO AN INTEREST BEARING ACCOUNT AND SET UP A BOARD WHO WOULD RECEIVE APPLICATION FROM THE LPWS EXECUTIVE COMMITTEE FOR USE OF THOSE FUNDS. EVEN IF THE LPWS WOULD HAVE ACCESS TO JUST THE INTEREST (KEEPING THE PRINCIPLE INTACT), WOULD BE OF GREAT BENEFIT TO THE LPWS IN ITS EFFORTS TO EXPAND MEMBERSHIP, EDUCATE THE PUBLIC ABOUT LIBERTARIAN IDEAS, AND ELECT LIBERTARIAN CANDIDATES TO OFFICE.

LET ME KNOW IF I CAN BE OF ASSISTANCE IN HELPING YOU MEET MY REQUEST. I AM INTERESTED IN SERVING ON A BOARD THAT THE CSG MIGHT SET UP. THANK YOU AGAIN.

SINCERELY FOR LIBERTY,

KAREN ALLARD
LPWS CHAIRMAN

Karen Allard

CC: DAVID JONES
TINA CARTER
LPWS EXECUTIVE COMMITTEE

2040-1393-1

Attachment DD

The Culture of Freedom

Libertarian Presidential Nominating Convention
Seattle Sheraton Hotel September 2, 3, 4, 5, 6, 1987

TO: CONVENTION SERVICES GROUP

FROM: LPWS EXECUTIVE COMMITTEE

THE LIBERTARIAN PARTY OF WASHINGTON STATE EXECUTIVE COMMITTEE IS REQUESTING FINANCIAL ASSISTANCE FROM THE CONVENTION SERVICES GROUP FOR THE SUM OF $1,330. THIS MONEY WILL BE USED BY THE LPWS TO PAY FOR THE FILING FEE AND VOTER'S PAMPHLET OF THE 7 WASHINGTON LIBERTARIAN LEGISLATIVE CANDIDATES. THIS IS A COMMITMENT THE LPWS WOULD LIKE TO FOLLOW THROUGH WITH BUT IS UNABLE TO DO THIS WITHOUT THE ASSISTANCE OF CSG.
IT IS THE FEELING OF THE LPWS EXECUTIVE COMMITTEE THAT THERE HAS BEEN AMPLE TIME TO SETTLE THE CSG ACCOUNT AND HAVE THE PROFITS FROM THE CONVENTION ACCESSABLE TO THE LPWS FOR USE DURING THE CAMPAIGN SEASON. THANK YOU FOR YOUR CONSIDERATION AND A PROMPT RESPONSE WOULD BE APPRECIATED.

SINCERELY FOR LIBERTY,

Karen Allard

KAREN ALLARD
LPWS CHAIRMAN
JULY 23, 1988

9204091393 2

P.O. Box 23108 Seattle, WA 98102

Minutes of August 27, 1988 LPWS SEC Meeting

At 11:15 a.m., the meeting was called to order.

Those in attendance were:

Karen Allard
Marla Bottemiller
Tina Carter
Art Rathjen
Rich Shepard
Tom Tanaka

Absent:
Margot Hamilton
Lee Woofenden

Correction of last month's minutes:

27th instead of 40th for Rich Shepard's legislative district.

Officers' Reports:

1. Chairman-

Karen went to San Francisco to the National Committee Meeting. Kirk McKee - acting National Director - seems hard-working, trying to put the office together. Republishing a statement of principles for the Libertarian Party. Tina will provide information on instant members for National - sending addressing information to National for update. Sent in Allards' and Carter's business lines. Came back with arty camera-ready ads, and passed around LP Products catalog. The mood at the meeting seemed at times defensive- Karen also received a check for $900 from Convention Services (convention entanglements). It cost $15 for 20 Platforms- Karen handed out a National Platform to each of us present. Karen would like to recieve $38.04 for postage and other costs- which was approved. Margot will be asked to write check to Karen for this amount.

2. Campaigns-

Jim Bohn formally resigned - down to 9 members - Tom Tanaka will put an announcement concerning the position opening in the newsletter. Candidates will need access to LP mailing list for fundraising letters- this was approved. Marla has Jim Bohn's address, if anyone would like to contact him.

3. Finance-

A correction to an entry in the "Campaigns donation list" will be requested of Margot. Campaign funds to be discussed later- National does not have such records available.

4. Communicatons-

37 letters had been sent to people who had requested information- news releases sent associated with candidates. Audio tapes- 4 brief radio commercials - (double cassette player could make copies- Marla to ask Tom Isenberg if he would be willing to do this for state LP). These were made by Michigan LP and additional copies are o.k. to make (public domain). Art also told us about Operation New Map, where 34,000 Nolan charts were handed out in Atlanta during the Democratic National convention. Findings were that 73% of respondents fell into the LP quadrant; 74% of their chosen candidates fell into the Authoritarian section. Art said this could be used here as well with a name such as "Operation Political Homeless". He said that he would be challenging others to do so at the Tacoma Dome that day.

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5. Secretary-

Will inquire as to bulk-rate mailing costs from Post Office.

6. Newsletter Editor-

Extras of last newsletter were available. Regional news report not coming in from Idaho- their newsletter, the "Sawtooth" has been temporarily discontinued while they try to finish their ballot access procedure. Kirk McKee at National mentioned he needed a copy of our letter, but Tom noted that they are on the mailing list right now. October 8th- 9 a.m. on Capitol Building steps, all bodies will be needed for the state income tax protest. Marla mentioned a carpool will be coming from Microsoft of interested Libertarians there. Tom will put this date in newsletter. It was also mentioned that Norma Jean Almodovar is now not in prison any longer, but in a halfway-house situation. One can reach her via the "Friends of Norma Jean" address...

7. Nat Com-

Joe Dehn is one of the better representatives, Karen noted. He is good, yet persistent, and thorough. For general information, 47 out of 50 states will have Libertarians on their ballots. Karen motioned and Tina seconded $100 for general ballot access- it was approved.

8. King County-

No new news.

9. Pierce County-

On August 28, 1988 at Round Table Pizza, there was to have been a county meeting, concerning campaigns. Also, over Labor Day weekend, there was to have been a bicycle trip to 5 parks to pass out brochures for Rich's campaign, ending with a barbeque at Point Defiance State Park.

Ron Paul's visit to Spokane was mentioned- good media response.

Greys Harbor- there was a response call to an article in Justice Times. This area may be "reactivated" as there are 2 paid members in area and a very interested woman, Pam Cordell. She is not waivering in her interest at all.

'88 Elections-

Art Rathjen, Ron Joseph and Tom Isenberg are the 3 candidates on the Eastside. Steve Cornell- is still spending 16 to 18 hours a week on his doorbelling effort in his district. Ron, Art and Tom were interviewed by the Municipal League and felt that it went well. These three also will be featured soon in the Journal-American and have a very favorable interview with their editorial staff recently. An editorial endorsement should be forthcoming soon. Ron, Art feels, can win- but will need alot of help with campaign.

10. Membership-

27 new memberships and renewals- $200 in campaign contributions; $503 in memberships and renewals.

Rich motioned and Art seconded that when someone contributes $100 or more, that we give them an automatic free membership in the state LP. 2 voted yes, 2 voted no, 1 abstained. Chair broke tie with a "no", so the motion failed.

11. Skagit County-

~~No new news.~~ No rep present.

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There has been an error made [redacted] West (formerly PNB) and now information [redacted] provide the LP number to requestors in Bellevue and South King County.

New Business:

Rich, Steve and Karen helped with ballot access in Oregon and enjoyed it. We will be starting new projects in November as well as getting behind our encumbants, Art added!

There will be a retreat in January.

'89 convention constituition and by-laws; these matters will be coming up.

Next SEC meeting will be at the home of Art Rathjen on September 17, 1988; Marla will host following on October 15th.

Art moved to oppose light rail system and offer private planning with the following resolution:

"Be it resolved that the LPWS oppose a light rail transportation system financed by taxation, and encourage the volunatry development of such a system by private entrepreneurs so that planning decisions would be based on economic, rather than political, considerations and so that only those that use the service have to pay for it."

Tina seconded. Discussion followed, and motion was approved.

Meeting adjourned (time unknown).

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Minutes of the L.P.W.S. State Executive Committee meeting
November 18, 1989 - 11:00 am
Home of Mary Jo Swedenberg, Bellevue

Present:

Marla Bottemiller
Tina Carter
Mike Dunn
Steffan Gay
Klaus Heise
Dave Rogers
Mary Jo Swedenberg
Tom Tanaka
Lee Woofenden

Absent:

Karen Allard
Loretta Czap
Margo Hamilton
Jay Kidder
Rich Shepard

Call to Order:

The meeting was called to order at 11:00 by Marla.

Old Business:

CHAIR: Marla

Minutes:

The minutes from the last meeting were read and approved with minor modifications.

Correspondence:

Flyer
The Libertarian Party of New Hampshire has put out an "Aids and Liberty" flyer. Copies were made available.

SEC Members
A current list was passed out.

Dave Bergland
Dave Bergland is getting out of the publishing business. He is offering party members a discounted price on a last printing of Libertarianism in One Lesson of $4.00 per copy. Marla offered to check prices at other possible sources.

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There was not a consensus that we should buy any quantity at this time at this price.

FIJA:

There is a legislative committee that has to review the initiative before it can be submitted. Marla is looking into that process.

Voucher Initiative:

Marla had a meeting on the 8th of this month, and only one person came. They mentioned Clark Elementary in Issaquah. This is a public school, K-5, with open enrollment throughout the district. However, there is a requirement that each parent contribute 40 hours per term of service and that parents provide transportation for their children. Perhaps our voucher initiative should be directed more toward providing augmented choice and to encourage alternative situations such as Clark Elementary.

The WFIS welcomes our support as long as we disavow our party affiliation. Some strong opposition was raised to the thought of working on a project where we couldn't use our party name.

Steffan seconded dropping the voucher initiative and replacing it with an "abolish the public schools" initiative. His second died for the lack of a motion. It was suggested that we should proceed in two areas at this point: 1) determine what, if any, support exists in the legislature for this initiative or something like it, and 2) determine how to best get the word out.

Lee moved that we keep in touch with the WFIS, and that if that initiative comes out such that we like it, we give it our support in whatever way is best for that initiative - but that we not proceed with our own initiative. A friendly was made by Marla and accepted to say that we join forces with the WFIS and not strike out on our own. The motion was seconded and approved with Dave dissenting.

"Washington Journal"

Dean Katz is the editor. Marla has subscribed and has received 4 issues. The publication is bi-monthly and covers Washington state politics, government and business. It could be a valuable resource for the Campaigns Chair and other members of the executive committee. It costs $90.00 per year. Marla will route the issues that she has received so far, to allow others to determine to what extent this expense should be born by the LPWS, and to see if others are interested in using this resource. We will have the opportunity to contribute articles.

Campaigns Chair: Rich

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Absent

Communications Chair: Open Position

Finance Chair: Tina

Telephone Listings

A request was submitted to U.S. West to add Bremerton and Yakima at a cost of $5.00 down and $1.00 per month for each. However, Everett, Skagit, and Bellingham are in GTE territory, and those books just came out. Yellow pages listings would cost in the area of $5.20 monthly for a basic listing.

Campaign 90 Fund Raiser

The outing netted $1,084.02, to be split between Pierce County and the LPWS. Turnout was low but a splendid time was had by all.

Account

The account stands at $1,536.35, with some bills still outstanding including part of the Quill purchase. A financial report was distributed.

A copy of our check book for the last four years was delivered to Denton, our accountant, along with the names and addresses of SEC members.

Membership Chair: Lee

Lee sent out 118 membership renewal notices and 10 newsletter renewal notices, 80 prospect letters, and 75 letters as part of the National Membership Mailing.

The Phone Tree is not yet firmly rooted. Lee printed up a "How to Organize" manual for prospective regional/county organizers.

Dean Brittain from Mt. Vernon is considering running against Al Swift next year - especially if Swift is running unopposed. Swift is sitting on the "Fair Elections Act" - HR1582, as chairman of the house elections subcommittee.

Newsletter: Tom

Many materials such as pamphlets, articles, etc. have been received by Tom in his position as newsletter editor, and he made them available. The Newsletter deadline is the Monday following the monthly SEC meeting.

The new letterhead lists Tom's telephone number instead of the message line. He will live with the situation for now.

Some comments have been received that the message on the

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message line is spoken too quickly, and that it would be better if it were slowed down.

Secretary: Dave

Nothing.

King County Representative: Mary Jo

The November meeting was attended by 25 or so people - a larger meeting place may need to be found. The guest speaker was Ron Arnold of the Journal Messenger. He talked about methods for organizing, and for growing organizations.

Pierce County: Klaus

The next meeting will be on December 28th, and will focus on the FIJA amendment.

Klaus proposed enhancing the message line with an automated hot line, somewhat along the lines of the electronic Yellow Pages. Such a device can be purchased for $500.00 and requires a host PC. LP member mailboxes, Nolan quiz, party positions and party events are some examples of items that could be handled by this type of system.

Skagit County: Jay

Absent

Snohomish County: Steffan

Steffan is looking for help in getting a meeting organized.

Environmental Liaison: Margot

Absent

Special Investigator: Mike Dunn

Mike delivered a preliminary report. He has reviewed the pertinent minutes and other documents pertaining to the creation of the CSG. He stated:

> It is fairly clear that the Invisible Hand Foundation is free and clear of any obligation to the LPWS, and moreover that this fact was acknowledged by the State Executive Committee.

He also stated that the investigation was not yet complete.

Next Meeting:

The next meeting will be held at Marla's on the 16th of

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December at 11:00. Klaus is hosting in January. Moses Lake is on tap for April.

New Business:

A wide ranging discussion followed with key points listed below.

We need to concentrate on new membership. For example, send a post card to attendees of county meetings, thanking them for their attendance, and welcoming their return. To paraphrase Karen's intent for National membership, we need to "woo the prospect".

We should be talking to each other more - in order to get to know each other, so that we can perhaps begin to work together better.

We might want to create a procedures manual for the SEC positions - including a statement of purpose and some examples of things we have done right and others we have done wrong.

We should not be in such a hurry to fill open positions. Perhaps we should wait for volunteers. We should definitely "talk up" the openings in the newsletter.

We could have "support committees" for chair positions. Members would help the chair do their job, and also gain experience in the requirements of the position.

County organizations may want to alternate speaker oriented meetings with discussion oriented meetings. At these meetings, it is important so solicit opinions from everyone, and to not "judge" opinions (everyone else will be quick enough at that).

We could add subscription forms to "Freeman" magazine to new member mailings or even prospect letters. We could purchase mailing lists from the state on initiatives that had a Libertarian slant. We could also rent lists.

We could have a Party party. Or we could have regional picnics on the same day - perhaps we could combine this idea with the nominating convention.

How do we get people who show an interest, and come 7 consecutive weeks to a seminar, and enjoy every minute of it, to DO something?

The party has this fitful understanding of the necessity of building up personal collusion among its members, that our willingness to get together is based not only on the fact that we agree to common things, but that we actually like each other as individuals.

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Lee handed out a proposal for increasing membership entitled "Eliminating LPWS Membership Fees".

Move to adjourn:

The meeting was adjourned at 3:13.

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LIBERTARIAN PARTY OF WASHINGTON STATE
EXECUTIVE COMMITTEE MEETING MINUTES
December 20, 1986

The Executive Committee of the LPWS met at Tom Olson's residence in Seattle on December 20th. Tom called the meeting to order at 1:17 pm. Members present were:

Tina Carter	Membership Chair
Tom Olson	Same Duck Chair
Tom Tanaka	King County Representative
Loretta Crab	Spokane County Representative
David Jones	Campaigns Chair

Others present were:

Margot Hamilton	Observer, King County
Jim Mills	Observer, Spokane County
Ruth Bennett	National Committee Representative
Rich Shepard	Convention Director

The minutes of the November meeting were distributed. No changes were made.

Margot Hamilton agreed to keep the books until a replacement for Jim Paddicord was found.

Tina reported a statewide membership of 85. National reports 122 members in Washington.

David Jones reported that the US Supreme Court had decided that Washington's 1% requirement was not unconstitutional.

Margot agreed to be the Communications Chair. The issues of importance are the telephone location, and someone to respond to calls. It was moved and seconded that the line be moved to Rich Shepard's residence in Tacoma. No objection was raised and the chair declared the motion passed. David Jones agreed to have his name used for billing.

Tom Tanaka announced that Walter Block would be coming to Seattle for a couple of days of speaking engagements at the end of January. The Libertarian Discussion Group at the U of W is sponsoring.

Ruth mentioned a meeting of the Pierce County organization at which attendance was low.

Loretta said that the Spokane group is inactive.

Ruth reported on the December meeting of the National Committee. Topics there were: No Money, Convention Platform Committee Selection, and the Ron Paul Push. She also mentioned that she would not be able to attend the April meeting.

Rich Shepard announced a convention resources meeting on the 13th. He noted that the Articles of Incorporation had been signed and that there was a filing fee of 20 dollars. He discussed hotel contract problems and script problems, and asked everyone to attend the volunteer meetings.

The date for the state convention was set for the 2nd of May. No firm location was announced. Ruth volunteered to chair the constitution/bi-laws committee. Tina Carter and David Jones volunteered to do credentials and rules. Tom Tanaka was elected chair of the Platform Committee.

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There ensued a discussion of Blue Canyon.

The next [illegible] was agreed to be the 15th of January, and Vancouver was declared as the location.

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APPENDIX C

CSG/IHF DOCUMENTATION

2204091394 4

Attachment C1

FILED

DEC 23 1986

SECRETARY OF STATE
STATE OF WASHINGTON

ARTICLES OF INCORPORATION

* * * * * *

The undersigned, for the purpose of forming a corporation under the nonprofit laws of the State of Washington, R.C.W. 24.03, hereby adopts the following Articles of Incorporation.

ARTICLE I

The name of the corporation shall be:

LPWS Convention Services Group

ARTICLE II

The term of existence shall be perpetual.

ARTICLE III

The purposes for which the corporation is organized are as follows: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 U.S.C. Section 527), as amended, and, any other lawful purpose that political organizations may engage in.

ARTICLE IV

The name of the Registered Agent of the corporation is:

RICHARD SHEPARD

The street address of the Registered Office, which is also the address of the Registered Agent, is as follows:

514 North 11th, #2
Tacoma, Washington 98403

The post office box number, which may be used in conjunction with the Registered Agent address, is:

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ARTICLE V

There shall be three (3) directors serving as the initial Board of Directors. Their names and addresses are as follows:

DIRECTOR Ruth E Bennett 2405 Terrace Dr Puyallup Wa 98372

DIRECTOR David A Jones 18022 SE 128th Renton Wa 98056

DIRECTOR Bettina R. Carter 1205 Olive St E #A Seattle Wa 98122

ARTICLE VI

In the event of dissolution of the corporation, the net assets are to be distributed as follows: To the Libertarian Party of Washington State for its use in functions exempt from Federal Tax under the authority of 26 U.S.C. Section 527, as amended.

ARTICLE VII

The names and addresses of each incorporator is as follows:

Ruth E Bennett 2405 Terrace Dr Puyallup Wa 98372

David A Jones 18022 SE 128th Renton Wa 98056

Bettina R Carter 1205 Olive St E Apt A Seattle Wa 98122

IN WITNESS WHEREOF, each incorporator has affixed his/her signature on this 22d day of December, 1986.

Ruth E Bennett _____

David A Jones _____

Bettina R Carter _____

_____

_____

_____

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CONSENT TO APPOINTMENT AS REGISTERED AGENT

I, RICHARD SHEPARD, hereby consent to serve as Registered Agent, in the State of Washington, for the corporation herein named. I understand that as agent for the corporation, it will be my responsibility to receive Service of Process in the name of the corporation; to forward all mail to the corporation; and to immediately notify the Office of the Secretary of State in the event of my resignation or of any change in the Registered Office address of the corporation for which I am agent.

DATED this 22d day of December, 1986.

Richard Shepard
Registered Agent

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MINUTES OF THE ORGANIZATIONAL MEETING

OF THE BOARD OF DIRECTORS

OF

LPWS-CONVENTION SERVICES GROUP

The organizational meeting of the Board of Directors of LPWS - Convention Services Group, a Washington nonprofit corporation, was held at 431 Rainier Ave S Renton, Washington, on the 21st day of February, 1987, pursuant to call by Ruth Bennett, an incorporator of the corporation. All of the initial Board of Directors of the corporation named in the Articles of Incorporation were present in person, they being Ruth Bennett, David Jones and Bettina Carter. Also present was Richard Shepard. Each director waived notice of the meeting.

Ruth Bennett presided as Chairman of the meeting and David Jones acted as Secretary of the meeting and recorded the Minutes.

The Chairman stated that the meeting was called pursuant to RCW 24.03.135 to adopt bylaws, elect officers and appoint a registered agent, designate a registered office and transact such other business as may come before the meeting.

The Chairman reported that on December 23, 1986, the Secretary of State of the State of Washington, following the filing of the Articles of Incorporation of the corporation issued a Certificate of Incorporation pursuant to RCW 24.03.145.

There ensued a discussion concerning the matters for consideration, after which, upon motion duly made, seconded and carried, the following resolutions were unanimously adopted by the Board of Directors of the corporation:

1. RESOLVED the Bylaws consisting of six pages inserted in the minute book of this corporation following the Articles of Incorporation are hereby adopted as the Bylaws of this corporation.

2. FURTHER RESOLVED that the following are hereby elected as officers of this corporation to serve until the next annual meeting of directors and until the election and qualification of their successors:

President	Ruth Bennett
Vice President/Secretary	David Jones
Treasurer	Bettina Carter

3. FURTHER RESOLVED that the President, the Secretary or the Treasurer of the corporation are hereby authorized to execute on behalf of the corporation any and all forms of bank resolutions dealing with corporate banking matters, including the establishing and maintaining of corporate bank accounts, which in their judgment from time to time may be required for the proper fiscal management of the corporation, including

the designation thereon of such authorized signatures of corporate officers as may to them seem appropriate. The said officers may execute such banking resolution or resolutions as if authorized to do so by a specific resolution of the Baord of Directors adopted on the date this resolution was adopted by the Board. A copy of any such banking resolutions shall be placed in the corporate minute book.

4. FURTHER RESOLVED that the registered office of this corporation is hereby designated to be 610 South J Street, Tacoma, Washington 98405.

5. FURTHER RESOLVED that Richard Shepard is hereby appointed as the registered agent of this corporation, and that such registered agent is an individual residing in the State of Washington whose business office is the same as that of the above designated registered office of this corporation.

6. FURTHER RESOLVED that the President or Vice President is hereby directed to execute a statement of the aforesaid designation of registered office and appointment of registered agent, and the Secretary is hereby directed to certify as true these resolutions and to file such statemnt with such certified resolutions and written consent of the registered agent to serve, with the Secretary of State of the State of Washington.

Following the adoption of the foregoing resolutions and there

being no further business to come before the meeting for consideration, it was duly adjourned subject to call by the President.

Respectfully submitted,

Approved:

2204097-3951

BYLAWS

OF

LPWS-CONVENTION SERVICES GROUP

A Washington Nonprofit Corporation

ARTICLE I - BOARD OF DIRECTORS

Section 1. There shall be no members of this corporation.

Section 2. The management and administration of the affairs of this corporation shall be a board of directors which shall be a self-perpetuating body. Any member of the board of directors may make recommendations to the board as to persons eligible for membership. Any person so recommended may be elected to membership by a unanimous vote of the board of directors. The board of directors shall consist of not less than three persons who shall be elected to serve terms of three years each and until their successors have been elected and qualified.

Section 3. Within the limits of Section 1 hereof, the number of directors may be changed at any time by a unanimous vote of the directors at any regular meeting or at any special meeting called in whole or in part for that purpose.

Section 4. Sixty-six percent of the members of the board of directors shall constitute a quorum.

Section 5. The board of directors may by resolution delegate such authority to one or more of the directors as it deems necessary or appropriate for the carrying out of the objects of the corporation.

Section 6. In the event of a vacancy on the board of directors the remaining directors by majority vote may elect a successor to fill the unexpired term. If there only be one director serving, he may elect successors to fill the unexpired terms of vacant positions on the board. If all positions are vacant by reason of death or otherwise, the Superior Court of any county in the state of Washington shall have authority to appoint persons to fill such vacancies, such persons to be selected for their interest and ability to carry out the purpose of the corporation.

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ARTICLE II - OFFICERS

Section 1. The elected officers of the corporation shall be a president, a vice president, a secretary and a treasurer, each of whom shall be elected by the board of directors at its organizational meeting. Any two or more offices may be held by the same person, except the offices of president and secretary. Each officer will serve for a period of three years following his election and until his successor shall have been elected and qualified. In the event of a vacancy, the board may elect a successor to fill the unexpired term.

Section 2. The duties of the president, vice president, secretary

and treasurer shall be such as are usually imposed upon such officials of corporations and as are required by law and such as may be assigned to them respectively by the board from time to time, but checks upon any bank account of the corporation shall be signed only by a member of the board of directors or such person as the board may from time to time appoint by an appropriate resolution.

ARTICLE III - CHARITABLE DISTRIBUTIONS

Subject to the Articles of Incorporation and applicable law, the funds of the corporation may be distributed only for the following purposes: To perform such acts or functions as are classified as exempt from tax under the authority of Section 527 of the Internal Revenue Code of 1954 (26 USC Section 527) as amended, and, any other lawful purpose that political organizations may engage in.

ARTICLE IV - MEETINGS

Section 1. The annual meeting of the board of directors shall be held on the first Monday in the month of January.

Section 2. Special meetings of the board of directors shall be held upon the call of the president or upon the written request and ten days notice in writing signed by thirty-three percent of the members of the board.

Section 3. Each director shall be entitled to cast one vote at any election or on any subject before any annual or special meeting of the directors.

Section 4. Notice of any meeting of the board may be waived in writing by any director at any time.

ARTICLE V - INDEMNIFICATION

Section 1. Any person who is made or was a party or is threatened to be made a party to any threatened, pending or completed action, suit, or proceeding, whether civil, criminal, administrative, or investigative, by reason of the fact that he is or was a director or officer of this corporation or is or was serving at the request of this corporation or is or was serving at the request of this corporation as a director, trustee, officer, employee, or agent of another corporation, partnership, joint venture, trust or other enterprise, shall be indemnified against expenses (including attorneys fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred by him in connection with such action, suit, or proceeding, if he acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interests of the corporation and with respect to any criminal action or proceeding had no reason to believe his conduct was unlawful. In any action or suit by or in the right of this corporation to procure a judgment against such a person, no indemnification shall be made in respect of any claim, issue or matter as to which he shall have been

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adjudged to be liable for negligence or misconduct in the performance of his duty to the corporation unless and only to the extent that the court in which such action or suit was brought shall determine upon application that, despite an adjudication of liability, he is fairly and reasonably entitled to indemnity for such expenses which such court shall deem proper. On request of such person who is made or is threatened to be made a party to any such suit, this corporation shall enter into an agreement confirming the foregoing indemnity subject to limitations as provided by law in such instances. The indemnification herein provided for shall continue as to a person who has ceased to be a director or officer of this corporation shall inure to the benefit of his heirs, executors, and administrators and shall be in addition to rights of indemnification provided by law.

Section 2. This corporation shall pay expenses incurred in defending a civil or criminal action, suit, or proceeding against which a person shall be entitled to indemnification under Section 1 of Article VI in advance of a final disposition of such action upon receipt of an undertaking by or on behalf of the person to repay such amount if the person is not entitled to indemnification as provided by law.

Section 3. This corporation may purchase and maintain insurance on behalf of any person who is or was a director, trustee, officer, employee, or agent of the corporation, or is or was serving at the request of the corporation as a director, trustee, officer, employee

or agent of another corporation, partnership, joint venture, trust, or other enterprise against any liability asserted against him and incurred by him in any such capacity or arising out of his status as such, whether or not the corporation has or would have the power to indemnify him against such liability under law.

ARTICLE VI - AMENDMENTS TO BYLAWS

These bylaws may be altered, amended or repealed and new bylaws may be adopted by majority vote of the board of directors.

CERTIFICATION

I certify the foregoing is an exact copy of the bylaws of LPWS-Convention Services Group which wre adopted unanimously by the board of directors on FEB 21, 1987.

David Yamane
SECRETARY

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Attachment C2

OUTLINED IN RCW 24.03.302. NON-PROFIT CORPORATIONS FAILING TO FILE AN ANNUAL REPORT WILL BE ADMINISTRATIVELY DISSOLVED

N PROFIT CORPORATION ANNUAL REPORT

MUST BE FILED BETWEEN JAN 1 AND MARCH 1, 1987

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (PM-21)
OLYMPIA, WA. 98504

CORPORATION #	TRANS	STATE OF INC.
8-381457-7	LOF	WA

FILING FEE $5.00

AMOUNT REC'D	DATE RECEIVED	BY

CORPORATION NAME
LPMS CONVENTION SERVICES GROUP

% RICHARD SHEPARD
~~534 N 11TH 98~~
610 South J St
TACOMA WA 98405

* NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
RICHARD SHEPARD

* REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X RICHARD SHEPARD
~~534 N 11TH 98~~
610 South J St
TACOMA WA 98405

* AN ANNUAL REPORT MUST BE FILED EVERY YEAR BEFORE MARCH 1ST.

IF THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE, PLEASE INDICATE THE PROPER NAME/ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS:

CHANGE(S) ABOVE (AUTHORIZED BY DULY ADOPTED RESOLUTION OF THE BOARD OF DIRECTORS) ARE TO BE EFFECT AS OF	NEW REGISTERED AGENT (NAME)
NEW REGISTERED OFFICE ADDRESS: 610 South J St, Tacoma Wa 98405	SIGNATURE OF NEW REGISTERED AGENT INDICATING ACCEPTANCE OF THE APPOINTMENT: X /s/

A POST OFFICE BOX IS NOT ACCEPTABLE UNLESS SHOWN WITH THE PHYSICAL LOCATION IN THE SAME CITY

ANNUAL REPORT	FILL IN ALL SPACES — PLEASE TYPE OR PRINT LEGIBLY				
ADDRESS OF PRINCIPAL PLACE OF BUSINESS IN WASHINGTON (IF NONE, WRITE NONE)	None				
FOREIGN CORPORATIONS GIVE ADDRESS OF PRINCIPAL OFFICE IN STATE OR COUNTRY OF INCORPORATION	N/A				
BRIEFLY STATE NATURE OF THE BUSINESS WHICH THE CORPORATION IS CONDUCTING IN WASHINGTON	Political				
NAMES AND ADDRESSES OF OFFICERS AND DIRECTORS OF CORPORATION	PRESIDENT	STREET	CITY	STATE	ZIP CODE
	Ruth Bennett	2405 Terrace Dr	Puyallup	Wa	98372
	VICE-PRESIDENT	STREET	CITY	STATE	ZIP CODE
	David Jones	221 SW 153d St #114	Seattle	Wa	98166
	SECRETARY	STREET	CITY	STATE	ZIP CODE
	David Jones	"	"	"	"
	TREASURER	STREET	CITY	STATE	ZIP CODE
	Bettina Carter	1205 E Olive St #A	Seattle	Wa	98122
	DIRECTORS	STREET	CITY	STATE	ZIP CODE

(ATTACH ADDITIONAL SHEET IF NECESSARY)

SIGNATURE AND TITLE OF PRESIDENT OR VICE-PRESIDENT AND SECRETARY OR TREASURER	TITLE	DATE
X Ruth E Bennett	President	2 FEB 87

FILING FEE $5.00 MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. DO NOT SEND CASH.

Mailed 2/25 by ck #500

Attachment C2

AS INCLUDED IN RCW 24.03.260, NON-PROFIT CORPORATIONS FAILING TO FILE ANNUAL REPORT SHALL BE ADMINISTRATIVELY DISSOLVED

NON PROFIT CORPORATION ANNUAL REPORT

MUST BE FILED BETWEEN JAN 1 AND MARCH 1, 1987

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (FH-11)
OLYMPIA, WA. 98504

00224MAR 587

CORPORATION #	TRANS	STATE OF INC	FILING FEE $5.00	AMT REC'D	DATE RECEIVED	BY
B-283467-7	LBP	WA		5.00	3-26-87	MM

CORPORATION NAME
LPMS CONVENTION SERVICES GROUP

X RICHARD SHEPARD — Reigned 9/25/87
610 South T St
TACOMA WA 98405

(ADT)

• NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
RICHARD SHEPARD

• REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X RICHARD SHEPARD
610 South T St
TACOMA WA 98405

1987

• AN ANNUAL REPORT MUST BE FILED EVERY YEAR BEFORE MARCH 1ST.

IF THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE, PLEASE INDICATE THE PROPER NAME ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS.

(2) 610 South T St Tacoma Wa X Richard Shepard

A POST OFFICE BOX IS NOT ACCEPTABLE UNLESS THERE IS NONE WITH THE PHYSICAL LOCATION IN THE SAME CITY

ANNUAL REPORT — FILL IN ALL SPACES — PLEASE TYPE OR PRINT LEGIBLY

None
N/A
Political

NAMES AND ADDRESSES OF	STREET	CITY	STATE	ZIP CODE
Ruth Bennett	2405 Terrace Dr	Puyallup	Wa	98372
David Jones	221 SW 153rd St #H4	Seattle	Wa	98166
David Jones	"	"	"	"
Bettina Carter	1205 E Olive St #A	Seattle	Wa	98122

(ATTACH ADDITIONAL SHEET IF NECESSARY)

TITLE DATE

X [illegible] President 9/25/87

FILING FEE $5.00 MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. DO NOT SEND CASH.

0040913959

Attachment C3

The Culture of Freedom

Libertarian Presidential Nominating Convention
Seattle Sheraton Hotel September 2, 3, 4, 5, 6, 1987

Skip Barron
7727 26th Avenue NW
Seattle, WA 98117

26 August 1987

Dear Skip,

LPWS Convention Services Group is willing to offer you one (1) Full Convention Package if you agree to the following:

1) That you will help where needed and asked at the Convention.

2) That you do not malign or defame the Convention or any of the Board or staff of the Culture of Freedom or the Libertarian Party of Washington State.

3) That you agree not to sue or bring any other legal action against the Libertarian Party of Washington State or LPWS Convention Services over any issue dealing with this Convention.

4) That you agree not to bring any action against the Libertarian Party of Washington State or LPWS Convention Services to the Judicial Committee of the LPWS or the National Libertarian Party.

Please sign the enclosed copy of this letter and send it to us in the enclosed envelope so we receive it by August 31st and we'll have your full package available for you at the Convention.

For Liberty,

Ruth E. Bennett
LPWS-Convention Services

I understand and accept these conditions.

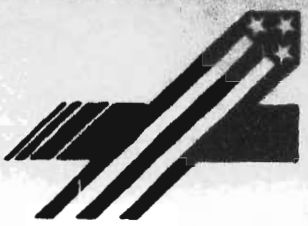
D. W. "Skip" Barron

96

P.O. Box 23108 Seattle, WA 98102

92040913960

Attachment C4



The Culture of Freedom

Libertarian Presidential Nominating Convention
Seattle Sheraton Hotel September 2, 3, 4, 5, 6, 1987

FILED

SEP 28 1987

SECRETARY OF STATE
STATE OF WASHINGTON

September 11, 1987

To: Secretary of State
Corporation Records
Olympia, WA 98504

Re: LPWS-CSG Registered Agent

Dear Sir:

Please be advised that as of September 2, 1987 I have resigned as Registered Agent for LPWS-Convention Services Group, a non-profit Washington corporation. Please contact the officers of said corporation for advice on my replacement.

Very truly yours,

RICHARD SHEPARD
610 South J Street
Tacoma, WA 98405
(206) 627-3545

RS/cb

cc: LPWS-CSG

RESIGNATION OF REGISTERED AGENT

P.O. Box 23108 Seattle, WA 98102

LOF 3/5/87 PURGE: 11/18/87

Attachment C5

SECRETARY of STATE

Corporations Division
2nd Floor, Republic Bldg.
505 E. Union
Olympia, WA 98504
Information (206) 753-7115
Receptionist (206) 753-7120

TO: LPWS-CONVENTION SERVICES GROUP
% Ruth Bennett , President
2405 Terrace Dr.
PUYALLUP, WA 98372

DATE: SEPTEMBER 29, 1987

FROM: Corporations & Trademarks Division

RE: Resignation of Registered Agent. Change of Registered office address.

This office has just been notified of the resignation of Richard Shepard, who is shown on our records as the registered agent for your corporation at the registered office address of 610 South J St. TACOMA, WA 98405.

According to RCW 2403, the corporation has 45 days from the date of this notice to appoint a new registered agent and/or designate its current registered office address in the state of Washington. We have enclosed forms for completing this filing.

PLEASE BE ADVISED THAT FAILURE TO MEET THE FILING DEADLINE WITHIN THE 45 DAY PERIOD WILL RESULT IN ADMINISTRATIVE DISSOLUTION OF THE CORPORATION OR REVOCATION OF THE CERTIFICATE OF AUTHORITY TO DO BUSINESS IN WASHINGTON AS OF Nov. 18, 1987.

If you have any questions regarding completion of the enclosed forms or the filing requirements, please do not hesitate to contact this office between the hours of 8:00 a.m. to 11:00 a.m. and 1:00 p.m. to 3:30 p.m. at (206) 753-7115.

By: Tobi L. Snyder
(Corporations clerk)

ssf 13 (8/84)

9204091396 2

MEMO

TO: Tina Carter,
Treasurer, Convention Services Group
FROM: Clifford Thies CFT
Treasurer, Libertarian National Committee
SUBJECT: invoice, dated October 16, 1987
DATE: November 4, 1987

1. This is to inform you that I have received your invoice dated October 16, 1987, totalling $8,278.08 in connection with certain alleged expenses and fees.

2. It is my understanding that the National Libertarian Party is in no way responsible for any of these expenses and fees, and has never represented itself as accepting such responsibility, and has several times represented to you that it would not accept such responsibility.

22040713963

SECRETARY of STATE

RECEIVED
SECRETARY OF STATE
STATE OF WASHINGTON
NOV 12 1987
CK 5.00 CASH ____
TR R01 AMT 5.00

Attachment C7
FILED
12 NOV 1987
SECRETARY OF STATE
STATE OF WASHINGTON

NON PROFIT CORPORATION STATEMENT OF CHANGE **FILING FEE $5.00**

The undersigned submits the following statement to change the corporation's Registered Agent, Registered Office address, or both in accordance with RCW 24, Washington Nonprofit Corporation Act.

1. NAME OF CORPORATION: LPWS-CONVENTION SERVICES GROUP.

X2. IF CHANGING REGISTERED AGENT:
Name of new/successor Registered Agent: (1) Thomas T Tanaka Jr.

AGENT'S CONSENT TO APPOINTMENT

X3. I hereby consent to serve as Registered Agent. I will accept and forward mail and Service of Process to the corporation. I will notify the Secretary of State of my resignation as Agent or of an address change.

X 11-10-87 (Date) X Thomas T Tanaka Jr (Signature of new agent designated on line 2)

X4. REGISTERED OFFICE ADDRESS:
The Registered Office address must be identical to the business address of the Registered Agent and must be located in the State of Washington. A post office box may be used in conjunction with the street address. However, the post office box must be in the same city as the Registered Office address.

(2) X1205 Olive St. E*A (4) Seattle WA 98122.
(street and # or rural route and box #, city, state and zip code)

☐ check this box to indicate if above is an address change.
Post Office box: ____.

X5. COMPLETE ONE OF THE FOLLOWING STATEMENTS:
↳ (a) ☒ The change of Agent was authorized by a resolution duly adopted by the Board of Directors and becomes effective on: 11/10/87.

(b) The only change to be recorded is the relocation of the Registered Office, within the State of Washington.* The Registered Agent notified the secretary of the corporation of the address change on: ____.

IN TESTIMONY WHEREOF, this statement is signed by the President or a Vice-President, the Secretary or the Treasurer of the corporation.

X11/10/87 (date) X Barbara L Carter (signature of an officer of the corporation)* X treasurer (title)

*(In the event the only change to be recorded is the relocation of the Registered Office, the Registered Agent is authorized to sign.)

Return completed forms to Secretary of State, Corporations Division, 505 E. Union (PM-21), Olympia, Washington 98504.

ssf 115 (R 4/86)

WARNER, NORCROSS & JUDD

ATTORNEYS AT LAW

900 OLD KENT BUILDING
ONE VANDENBERG CENTER
GRAND RAPIDS, MICHIGAN 49503-2489

TELEX 226-415 WARCROSS GDR

TELECOPIER (616) 459-2170 & (616) 459-2611

TELEPHONE (616) 459-6121

MUSKEGON OFFICE
COMERICA BANK BUILDING
801 WEST NORTON AVENUE
MUSKEGON, MICHIGAN 49441-4193
TELEPHONE & TELECOPIER (616) 739-2297

HAROLD S. SAWYER
CONRAD A. BRADSHAW
HAROLD F. SCHUMACHER
CHARLES C. LUNDSTROM
THOMAS R. WINQUIST
PAUL R. GASTON
GEORGE L. WHITFIELD
WALLSON G. KNACK
CHARLES E. McCALLUM
JEROME M. SMITH
JOHN D. TULLY
R. MALCOLM CUMMING
WILLIAM R. HOLMES
ROGER M. CLARK
EDWARD MALINZAK
JOHN H. LOGIE
DONALD J. VELDMAN
JACK B. COMBS
JOSEPH F. MARTIN
THOMAS J. McNAMARA
JAMES H. BREAT
ROBERT H. SHILTON III
ERNEST M. SHARPE
VERNON P. BAKER
HUGH H. MARENS

JOSEPH M. SWEENEY
GORDON R. LEWIS
ROBERT J. CHOVANEC
PETER L. GUSTAFSON
ROGER M. GETTING
J. A. CRAGWALL, JR.
STEPHEN R. KRETSCHMAN
W. MICHAEL VAN HAREN
JON P. BACHELDER
RICHARD A. BURELL
MICHAEL L. ROBINSON
JOSEPH G. SCOVILLE
EUGENE E. SMARY
DOUGLAS E. WAGNER
ROBERT W. SIKKEL
THOMAS H. THORNHILL
JEFFREY O. BIRKHOLD
BLAKE W. KRUEGER
JOHN G. CAMERON, JR.
JOHN H. MERENDRY, JR.
PAUL T. SORENSEN
CARL W. BUFENBACH
JAMES F. BOSSENBROEK
STEPHEN C. WATERBURY
PATRICK E. MEARS

RODNEY O. MARTIN
RICHARD E. CASSARD
STEVEN J. VANDER ARK
ALEX J. SKYORKA
RICHARD L. BOUMA
JOHN O. DUNN
WILLIAM W. HALL
STEPHEN P. CLIFTON
BRUCE C. YOUNG
SHANE B. HANSEN
F. WILLIAM McREE
LOUIS C. RABAUT
DOUGLAS A. DOREMAN
JOHN V. BYL
JANET P. KRAUS
KATHLEEN M. HANENBURG
MARK J. HENDERSON
TRACY T. LARSEN
SUE O. CONWAY
SHEILA C. McCARTHY
STEVEN R. MEACOCK
CAMERON S. BELONG
WILLIAM J. BARRETT
JEFFREY B. POWER
SCOTT D. HUBBARD

AMY S. KLEMM
MARY LOU HOWARD
STEPHEN S. GROW
M. GAYLE ROBINSON
MICHAEL A. WEDDELL
BRIDGET E. KEHOE

OF COUNSEL
CONRAD E. THORNQUIST
LAWSON E. BECKER
LEONARD B. VERDIER, JR.
PHIL R. JOHNSON

DAVID A. WARNER
1863-1956

GEORGE S. NORCROSS
1888-1960

SIEGEL W. JUDD
1895-1982

January 12, 1988

Ms. Ruth Bennett
43 Broadway, No. 2
Tacoma, Washington 98402

Re: Convention Services Group

Dear Ms. Bennett:

This letter is written as a follow-up to the resolution of the NATCOM concerning settlement of the dispute between the Libertarian Party and Convention Services Group over provision of services at the 1987 Libertarian National Convention. As you are no doubt aware, the NATCOM approved the settlement worked out between you and the special committee appointed to meet with you on the following terms and conditions:

1. The LP would pay to CSG the sum of $2,901.78, allocable as follows:

Media Services (including June national media mailing, national media mailing of platform, tabloid mailing (750), telephone follow-up costs, Seattle area media/press contacts, convention follow-up mailing and wire services costs)	$2,000.00
Printing Rules and Bylaws Reports	132.71
Printing Platform Reports	373.01
National Media List Mailing	66.06
Secretarial Services	330.00

2. Such payment is contingent upon receiving the following:

(a) Documentation (i.e., paid invoices, receipts, cancelled checks or other written evidence of payment) of the listed items;

(b) Complete copies of CSG media list and convention attendee list; and

P 2 3 4 0 7 1 3 9 6 5

(c) A release of the LP from any further liability for convention services provided.

If you have any questions concerning what sort of documentation might suffice, feel free to contact me so we can discuss the matter. My reading of the NATCOM's resolution is simply that the NATCOM be able to demonstrate to the LP membership that funds were spent for services which were actually performed. At the NATCOM meeting, a breakdown of certain costs was provided, but none of the supporting documentation was made available.

I have enclosed a simple form of release which I would propose be executed by Convention Services Group as part of the settlement. Please let me know if you believe any changes should be made to it. I look forward to hearing from you.

Very truly yours,

Bill Hall

William W. Hall

klr

Enclosure

2240913966

RELEASE

In consideration of the sum of Two Thousand Nine Hundred One and 78/100 Dollars ($2,901.78), the receipt of which is hereby acknowledged, Convention Services Group hereby releases the Libertarian Party, its members, officers, employees and national committee representatives from all liability which may have arisen by reason of the provision of services by Convention Services Group to the Libertarian Party or its national committee in connection with the 1987 Libertarian Party National Convention held in Seattle, Washington.

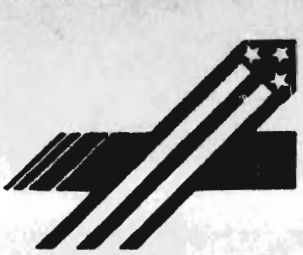
DATED: _____, 1988 CONVENTION SERVICES GROUP

By _____

Its _____

9204091399 67

Attachment C9



The Culture of Freedom

Libertarian Presidential Nominating Convention
Seattle Sheraton Hotel September 2, 3, 4, 5, 6, 1987

Bill Hall
Warner, Norcross & Judd
900 Old Kent Building
One Vandenberg Center
Grand Rapids, MI 49503-2489

17 JAN 1988

Dear Bill,

Thank you for your response and request for documentation. I was about to despair that anyone from the National Party was going to follow through on this.

We are certainly prepared to turn over media and attendee lists (Joe Dehn indicated to me he was going to give the media list to Paul Jacob at the December NatCom meeting.) and to document our costs. I'm also prepared to sign a release providing the National Chair will also sign a release for Convention Services Group. However, I am concerned as to just when we'll see a check.

As you may have gathered through this entire affair, the National Party has seldom done their duty. If I seem a bit "spooky" about dealing with anyone on the National level it's only because I've been burned every time I've had to deal with Jim, Paul Kunberger or the Convention Oversight Committee.

My point is that I want a check within 7 days of the National Office's receipt of the documentation and lists. I want an assurance, in writing, that I will receive such a check in such a timely fashion. I'm tired of this whole thing and want to close my books and pay my final bills.

I would like a response from you or Jim by the end of the month. I don't feel that this is unreasonable considering that I've been waiting for this money since September.

I do thank you for your reasonable approach to all of this. If a few others on the National level had ever realized that this Convention was to be a partnership, not an adversarial process, it would have been much more pleasant and productive.

For Liberty,

Ruth E. Bennett
President, CSG

92040913968

P.O. Box 23108 Seattle, WA 98102

RELEASE

In consideration of the documentation of services performed by Convention Services Group in connection with the 1987 Libertarian Party National Convention, and the receipt by the Libertarian Party of copies the Convention Services Group media list and convention attendee list, the Libertarian Party hereby releases Convention Services Group, its officers and employees, from all liability which may have arisen in connection with the 1987 Libertarian Party National Convention held in Seattle, Washington.

DATED: Jan. 28, 1988 THE LIBERTARIAN PARTY

By James B Turney
James Turney
Its Chairman

C240713969

Attachment C11

...ANNUAL NOTICE

...T CORPORATION ANNUAL REPORT

MUST BE FILED BY 5/10/88

00418 MAY 588

CORPORATION #	TRANS	STATE OF INC
E-381487-7	LOF	WA

FILING FEE $5.00

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION AVENUE (PM-21)
OLYMPIA, WA 98504

AMOUNT REC'D	DATE RECEIVED	BY
5.00	4-26-88	MM

CORPORATION NAME
LEWIS CONVENTION SERVICES GROUP
X THOMAS T TANAKA JR
1205 OLIVE ST E 8A

SEATTLE WA 98122

1988

REGISTERED AGENT IN STATE OF WASHINGTON
THOMAS T TANAKA JR

REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X THOMAS T TANAKA JR
1205 OLIVE ST E 8A

SEATTLE WA 98122

OUR RECORDS INDICATE THIS FIRM'S ANNUAL REPORT HAS NOT BEEN FILED. FAILURE TO COMPLETE THIS FILING BY THE DATE SHOWN ABOVE WILL RESULT IN ADMINISTRATIVE DISSOLUTION OF THE CORPORATION OR REVOCATION OF ITS CERTIFICATE OF AUTHORITY.

IF THERE HAS BEEN A CHANGE IN THE REGISTERED AGENT OR REGISTERED OFFICE ADDRESS PRINTED ABOVE, PLEASE INDICATE THE PROPER NAME/ADDRESS ABOVE AND COMPLETE THE FOLLOWING STATEMENTS:

THE CHANGE(S) ABOVE (AUTHORIZED BY DULY ADOPTED RESOLUTION OF THE BOARD OF DIRECTORS) TAKE EFFECT AS OF	NEW REGISTERED AGENT (NAME)
NEW REGISTERED OFFICE ADDRESS	SIGNATURE OF NEW REGISTERED AGENT INDICATING ACCEPTANCE OF THE APPOINTMENT X

P.O. BOX IS NOT ACCEPTABLE UNLESS SHOWN WITH A REGISTERED OFFICE STREET ADDRESS IN SAME CITY.

ANNUAL REPORT — FILL IN ALL SPACES — PLEASE TYPE OR PRINT LEGIBLY

ADDRESS OF PRINCIPAL PLACE OF BUSINESS IN WASHINGTON (IF NONE, WRITE NONE): none

FOREIGN CORPORATIONS GIVE ADDRESS OF PRINCIPAL OFFICE IN STATE OR COUNTRY OF INCORPORATION:

BRIEFLY STATE NATURE OF THE BUSINESS WHICH THE CORPORATION IS CONDUCTING IN WASHINGTON: Inactive

NAMES AND ADDRESSES OF OFFICERS AND DIRECTORS OF THE CORPORATION

	NAME	STREET	CITY	STATE	ZIP CODE
PRESIDENT	Ruth Bennett	43 Broadway #2	Tacoma	WA	98402
VICE-PRESIDENT	David Jones	221 SW 153rd #A114	Seattle	WA	98166
SECRETARY					
TREASURER	Bettina Carter	1205 Olive St E	Seattle	WA	98122
DIRECTORS	SAME				

(ATTACH ADDITIONAL SHEET IF NECESSARY)

SIGNATURE AND TITLE OF PRESIDENT OR VICE-PRESIDENT OR SECRETARY OR TREASURER: Bettina Carter — TITLE: Treasurer — DATE: 4/23/88

FILING FEE $5.00 — DO NOT SEND CASH — 0088 0021 0000 0603 — MAKE CHECKS PAYABLE TO STATE OF WASHINGTON

RELEASE

In consideration of the sum of Five Hundred and 00/100 Dollars ($500.00), the receipt of which is hereby acknowledged, Richard Shepard hereby releases Convention Services Group, the Libertarian Party of Washington State, their members, and officers from all liability which may have arisen by reason of the provision of services by Richard Shepard to Convention Services Group or the Libertarian Party of Washington State in connection with the 1987 Libertarian Party National Convention held in Seattle, Washington. This amount is agreed to settle all debts, salaries or payments due between Convention Services Group, the Libertarian Party of Washington State and Richard Shepard.

DATED: APRIL 28, 1988

RICHARD SHEPARD

Robert Bennett
Pres. CSG.

P20400139771

The Libertarian Party

Attachment C13

August 12, 1988

Ruth Bennett
43 Broadway, #2
Tacoma, WA 98402

Dear Ms Bennett,

William Hall informs me that he has today received from you a packet of information pertaining to the 1987 Libertarian National Convention substantially fulfilling your obligation under your contract with the Libertarian National Committee as recognized in a resolution passed at our December 1987 meeting.

I am accordingly sending you a check in the amount of $901.78 (enclosed), which is for the secretarial services and printing costs incurred by you.

I am not at this time sending you the full amount agreed to at our December 1987 meeting because of the untimely submission of your packet of information. Instead, I will bring this matter to the Libertarian National Committee's attention at its upcoming August meeting. It is my opinion that the value of information is dependent on its timeliness, and that your eight month delay in submitting your packet of information has compromised its value to us.

Yours truly,

Clifford F. Thies

CLIFFORD F. THIES
National Treasurer

9204021399 72

The Libertarian Party

Attachment C14

November [illegible]

Ruth Bennett
43 Broadway, #2
Tacoma, WA 98402

Dear Ms. Bennett:

Please find enclosed a check in the amount of [illegible] which represents payment toward the Libertarian Party's [illegible] debt to Convention Services Group of $2000.

As the LP's cash flow situation improves, additional payments will be made -- hopefully, on a monthly basis until the balance is paid.

If you have any questions concerning this, please do not hesitate to call.

In liberty,

Christine F. Fiedler

Christine F. Fiedler
Bookkeeper

cc: Jim Turney
Treasurer

C00409139 73

Attachment C15

NON PROFIT CORPORATION ANNUAL REPORT

Sent w/ck 2/25/89

MUST BE FILED BETWEEN JAN 1 AND MARCH 1, 1989

STATE OF WASHINGTON
RALPH MUNRO, SECRETARY OF STATE
505 EAST UNION (PM-21)
OLYMPIA, WA 98504

UBI	TRANS	STATE OF INC
	LOF	WA

FILING FEE $5.00

AMOUNT RECD	DATE RECEIVED	BY

CORPORATION NAME

CORP 2-381457-7

LPUS CONVENTION SERVICES GROUP

* NAME OF REGISTERED AGENT IN STATE OF WASHINGTON
THOMAS T TANAKA JR

X THOMAS T TANAKA JR
1205 OLIVE ST E 8A
/
SEATTLE WA 98122

* REGISTERED OFFICE ADDRESS IN STATE OF WASHINGTON
X THOMAS T TANAKA JR
1205 OLIVE ST E 8A
/
SEATTLE WA 98122

THE ANNUAL REPORT MUST BE COMPLETED AND FILED BEFORE MARCH 1ST.
CORPORATIONS FAILING TO FILE THE REPORT WITHIN TIME SPECIFIED SHALL BE DISSOLVED

COMPLETE IF REGISTERED AGENT OR ADDRESS PRINTED ABOVE HAS CHANGED—BELOW ACTIONS AUTHORIZED BY THE BOARD OF DIRECTORS

NEW REGISTERED OFFICE ADDRESS _____ NEW REGISTERED AGENT'S NAME _____

EFFECTIVE DATE: _____ CONSENT TO APPOINTMENT: X _____

A POST OFFICE BOX ALONE IS NOT ACCEPTABLE UNLESS SHOWN WITH THE PHYSICAL LOCATION IN THE SAME CITY.

ANNUAL REPORT

IMPORTANT — ALL INFORMATION REQUESTED MUST BE ENTERED, INCLUDING FULL ADDRESS AND ZIP CODE PRINT OR TYPE ALL INFORMATION EXCEPT SIGNATURES.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS IN WASHINGTON None

TELEPHONE NUMBER OF CORPORATION (206) 328-6501

BRIEFLY STATE NATURE OF BUSINESS IN WA Political

LIST NAME AND RESPECTIVE ADDRESS OF CORPORATE OFFICERS AND DIRECTORS—COMPLETE EACH LINE OR WRITE NA IF NONAPPLICABLE

	NAME	STREET	CITY	STATE	ZIP CODE
PRESIDENT	Ruth Bennett	43 B'way #2	Tacoma	WA	98402
VICE-PRESIDENT	David Jones	221 SW 153rd St #A114	Seattle	WA	98166
SECRETARY	David Jones	"	"	"	"
TREASURER	Bettina Carter	1205 Olive St E #A	Seattle	WA	98122
DIRECTORS					
(Attach list of additional directors)					

FOREIGN CORPORATIONS ONLY: Enter (a) Address of principal office wherever located and (b) state or country of incorporation

(a) (b)

X Bettina Carter Treasurer 2/25/89

SIGNATURE OF OFFICER (Pres., V. Pres., Sec. or Treas.) TITLE DATE

MAKE CHECKS PAYABLE TO STATE OF WASHINGTON. DO NOT SEND CASH.

LPUS CONVENTION SERVICES GROUP Corporation Number 2-381457-7

We are currently engaged in an effort to check the information used to clearly identify and maintain your corporation's file, and would like to ask for your cooperation in providing the information below. Thank you for assisting us with the records upgrade project.

(1) If this corporation has an exemption from Federal Income Tax, please enter the Federal Identification Number: _____ (if none, write "none")

(2) If this corporation is registered with the Department of Revenue for payment of B and O taxes or remittance of retail sales taxes, please enter the taxpayer registration number: _____

(3) If this corporation solicits funds for charitable purposes from the general public, is it registered as a Charitable Organization with the Charities Division of the Office of the Secretary of State? ____yes ____no

001-120 -765-SEC120-

92040913974

March 18, 1989
CSG Meeting

Present
Ruth Bennett-CSG President
Tina Carter-CSG Treasurer
Karen Allard-Observer
Jack Allard-Observer
Tom Tanaka-Observer

Absent
Dave Jones-CSG Member (Lives out of state)

Minutes
Meeting convened at the home of Karen and Jack Allard for the purpose of discussing the course of action for CSG. Jack was asked to be acting secretary.
National LP has finally paid CSG the money they owed. Only outstanding debt-balance owed to Tonie Nathan as media liason for the '87 convention.
The current board agreed that CSG would not dissolve at this time. Tina would continue to be in contact with the lawyer and accountant regarding the CSG and the CSG banki account. According to the bank statements, the CSG money iw intact in a non-interest bearing account.
Karen, Jack, and Tom expressed an interest in becoming involved in the CSG.
A brainstorming session occurred on the goals, a mission statement, and a new name for CSG. Tina will take this information with her when next appointment is made with accountant.
It was unanimous that the non-profit organization would work toward advancing the cause of liberty through an educational avenue such as purchasing and supplying libraries with Libertarian books, magazines, and other literature, sponsor Libertarian speakers, and participating in high school essay contests on the subjest of liberty.
The board unanimously voted to invest the CSG money in conservative manner when the accountant gave the okay.
The board agreed that by continuing to operate as a non-profit organization it would compliment the work being done by the LPWS.
Meeting adjourned to a later time and place.

Respectively Submitted,
Jack Allard
Jack Allard

2240913975

Convention Services Group has decided to apply for 501(c)(3) federal tax exemption status. This will enable us to accept tax deductible donations. The purpose of an organization which has the 501(c)(3) exemption must be charitable, educational, or provide a community service. We would be like the Reason Foundation or FEE, but with a local focus.

The new Board of Directors consists of:

President	Ruth Bennett
Vice President	Karen Allard
Secretary	Jack Allard
Treasurer	Tina Carter
Board Member	Tom Tanaka

We do not have a name for the foundation, but we need one soon. If anyone has suggestions, please let us know.

One of the conditions for 501(c)(3) status is to have no involvement with politics, support any political party or candidate, or take any action to influence politics. Our accountant explained that there is no way we can donate money or materials to the LPWS. One way for the foundation to monetarily assist the LPWS is to raise money especially for it and keep the money in a separate bank account. CSG could not use any of the money and it would have to be turned over to the LPWS within a reasonable amount of time.

Our accountant, who specializes in nonprofit organizations, will handle the applications and other paperwork.

We currently have $22,066.73 in the account. $20,000 will go into a high interest bearing account and CD. The rest has been budgeted for first year expenses. These will include stationary, envelopes, fund raising letters, and accountant fees.

Three projects we are considering at this time are donating books to libraries, arranging for speakers to come to the area, and sponsoring public interest TV or radio broadcasts.

CONVENTION SERVICES GROUP

TIMELINE

from end of convention to present.

Date	Event
thru 12/87	paid expenses and bills
2/88	Mack Barnette - payment for filing taxes
4/88	* Rich Shepard's final payment upon signing agreement * Tonie Nathan's expenses
5/88	* Tina Carter's phone bills of 8/87 to 10/87 * Reimbursement to Karen Allard for her convention package, as agreed upon during convention
7/88	donation to LPWS for campaigns
9/88	1st payment from National LP
1/89	2nd payment from National LP
2/89	* 3rd payment from National LP * Spoke informally to attorney, who recommended accountant
3/89	* 4th payment from National LP * Tonie Nathan's final payment
4/89	* 5th and final payment from National LP * Karen's letter to CSG asking for wrap up
5/89	Spoke to accountant on how to proceed
6/89	* Sent accountant info on CSG * Tina met with accountant (6/30/89) to prepare for full meeting with board
8/2/89	Ruth, Karen, Jack, Tom, Tina meet with accountant

P2040913977

SECRETARY of STATE

Corporations Division
2nd Floor, Republic Bldg.
505 E. Union
Olympia, WA 98504
Information (206) 753-7115
Receptionist (206) 753-7120

TO: INVISIBLE HAND FOUNDATION
1205 OLIVE ST E APT A
SEATTLE WA 98122

ATTN T TANAKA

DATE: 9-13-89

FROM: Corporations, Trademarks & Limited Partnership Division
505 E. Union, PM-21, Olympia, WA 98504

RE: LPWS CONVENTION SERVICES GROUP

We regret that we must return the above listed document(s) for the following corrections:

AMENDMENTS FOR NONPROFIT CORPORATIONS MAY BE ADOPTED BY THE DIRECTORS ONLY IF THERE ARE NO MEMBERS OR NO MEMBERS HAVING VOTING RIGHTS. IF SUCH IS THE CASE, THAT FACT MUST BE INDICATED IN THE ARTICLES OF AMENDMENT. IF THERE ARE MEMBERS WITH VOTING RIGHTS, THEY MUST ADOPT THE AMENDMENTS. I HAVE ENCLOSED SAMPLE FORMS FOR YOUR USE IF YOU WISH.

92040213978

We will be able to proceed with the filing(s) as provided by law upon receiving the corrected documents, together with all fees due. Please review your documents to ensure that you have completed all additional actions called for before you resubmit them for filing.

enc: ARTS OF AMEND; CHECK $10.00

By: ANN

...ice of Secretary of State
Corporations Division

ARTICLES OF AMENDMENT

WASHINGTON NONPROFIT CORPORATION ACT - 24.03

Pursuant to the provisions of RCW 24.03 of the Washington Nonprofit Corporation Act, the undersigned adopts the following Articles of Amendment to the Articles of Incorporation:

(1) The name of record of the corporation is: _____

LPWS Convention Services Group

_____

(2) The following amendment(s) to the articles of incorporation was(were) adopted on: August 21, 19 89 :

1204021397979

(3) Check and complete one of the following applicable statements:

( ) _____ was the date of the meeting of members at which the amendment was adopted. A quorum was present at the meeting and the amendment received at least two-thirds of the votes which members present or represented by proxy were entitled to cast.

( ) The amendment was adopted by a consent in writing by all members entitled to vote thereto.

(X) There are no members, or no members having voting rights. The amendment received a majority vote directors in office at a meeting of the board held on August 21, 1989.

9/21/89 (Date)

Tina Carter Treasurer (Signature and title of officer)

D2040213930

FILING FEE $10.00 FILE IN DUPLICATE

STATE of WASHINGTON SECRETARY of STATE

I, Ralph Munro, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

CERTIFICATE OF AMENDMENT

to

LPWS CONVENTION SERVICES GROUP

a Washington Non Profit corporation. Articles of Amendment were filed for record in this office on the date indicated below.

Amending Articles III and VI; Changing registered agent/address to: Tom Tanaka, 1205 Olive Street E, Apt. A, Seattle, WA 98122; and Changing name to THE INVISIBLE HAND FOUNDATION

Corporation Number: 2-381457-7 Date. September 25, 1989

Given under my hand and the seal of the State of Washington, at Olympia, the State Capitol.

Ralph Munro, Secretary of State

SSF 58

2204021398 1

Office of Secretary of State
Corporations Division

Attachment C18

FILED

SEP 25 1989

SECRETARY OF STATE
STATE OF WASHINGTON

ARTICLES OF AMENDMENT

WASHINGTON NONPROFIT CORPORATION ACT - 24.03

Pursuant to the provisions of RCW 24.03 of the Washington Nonprofit Corporation Act, the undersigned adopts the following Articles of Amendment to the Articles of Incorporation:

(1) The name of record of the corporation is: _____

LPWS Convention Services Group

(2) The following amendment(s) to the articles of incorporation was(were) adopted on: August 21, 1989:

SEE ATTACHED LIST OF AMENDMENTS

7 2 0 4 0 7 1 3 9 8 2

ssf 77-1 (R 11/84)

Amendments to the Articles of Incorporation for the LPWS Convention Services Group.

ARTICLE I

The name of the Corporation shall be: The Invisible Hand Foundation

ARTICLE III

The corporation is organized exclusively for educational, charitable, scientific and literary purposes, within the meaning of Section 501(c) (3) of the Internal Revenue Service

ARTICLE IV

The name of the registered Agent of the corporation is:

Tom Tanaka

The street address of the Registered Office, which is also the address of the Registered Agent is as follows:

1205 Olive Street East, Apt. A
Seattle, WA 98122

ARTICLE VI

In the event of dissolution of the corporation, the net assets will be distributed only to causes or organizations supporting and furthering the ideals of liberty, that are qualified or would qualify for exemption as organizations described in Section 501(c) (3) of the Internal Revenue Code of 1954, as amended, or a successor statute. Such decision is to be made at the discretion of the Board of Directors.

These amendments to the Articles of Incorporation were unanimously approved at a meeting of the Board of Directors held on August 21, 1989.

Tina Carter
Tina Carter, Treasurer

Date 9/9/89

(3) Check and complete one of the following applicable statements:

( ) _____ was the date of the meeting of members at which the amendment was adopted. A quorum was present at the meeting and the amendment received at least two-thirds of the votes which members present or represented by proxy were entitled to cast.

( ) The amendment was adopted by a consent in writing by all members entitled to vote thereto.

(X) There are no members, or no members having voting rights. The amendment received a majority vote directors in office at a meeting of the board held on August 21, 1989.

9/21/89 (Date)

Tina Carter Treasurer (Signature and title of officer)

P22040713934

FILING FEE $10.00

FILE IN DUPLICATE

ssf 77-2 (R 11/84)

Statement of Consent for the Registered Agent for the Invisible Hand Foundation

I, Tom Tanaka, accept the designated role as Registered Agent for the Invisible Hand Foundation. Furthermore, I accept responsibility for the receiving of Service of Process in the name of the corporation, for forwarding mail to the corporation, and for immediately notifying the office of the Secretary of State in the event of my resignation or of any change in the address of the registered office of the corporation

Tom Tanaka

Tom Tanaka

Date 9-9-89

2240713985

Bylaws of The Invisible Hand Foundation

ARTICLE I. NAME

The name of the corporation is The Invisible Hand Foundation

ARTICLE II. PURPOSE

2.1 State of Purposes

To operate exclusively for religious, charitable, scientific, literary, or educational purposes, within the meaning of Section 501 (c) (3) of the Internal Revenue Code of 1954.

2.2 Non-profit Operation

All income of the corporation after paying the costs of operation and making provision for adequate reserves shall be devoted to the purposes described in Articles 2.1 of the Bylaws and to charitable, educational, and scientific purposes. No part of the net earnings of the corporation shall be distributed to its members, directors, officers or other private persons.

Notwithstanding any other provision of these bylaws, no director, officer, employee or representative of the corporation shall take any action or carry on any activity by or on behalf of the corporation not permitted to be taken or carried on by an organization exempt under Internal Revenue Code Section 501 (c) 3 or which would cause the corporation to be classified as a private foundation under Internal Revenue Code Section 509.

ARTICLE III. MEMBERSHIP

There shall be no members of the corporation

ARTICLE IV. BOARD OF DIRECTORS

4.1 Management of the Corporation

The business, operations and affairs of the corporation shall be controlled by a Board of Directors.

4.2 Number of Directors

The number of directors of the corporation may be no more than fifteen (15). The Board of Directors may also elect ex-officio members of the Board as it deems appropriate. Ex-officio members of the Board shall not have the right and responsibility to vote but shall attend the meetings of the Board. As from time to time designated by the Board of Directors or President, ex-officio Board members may be appointed to committees and attend meetings of committees and, for purposes of these bylaws as they may provide for committee appointments, ex-officio members shall be included in the term "directors". However, a majority of all Board committees shall consist of active members of the Board.

4.3 Qualifications of Directors

Any person may serve as a director of the corporation so long as:

A. Such individual is not an employee of the corporation.

4.4 Term of Office

The term of office for each director shall be two (2) years. Each director shall hold office for the term for which he/she was elected and until his/her successor shall have been elected and qualified. The terms of the Directors shall be staggered such that approximately one-half of the Board shall be elected annually. If necessary to avoid termination under the above rules, the term of the Past President shall be extended so that said person may fulfill the two-year term of office as Past President. A director shall be eligible for reelection to three (3) consecutive terms in office.

4.5 Nomination and Election of Directors

Election of directors shall be made from among those persons nominated for that purpose by the Nominating Committee. The Board of Directors shall by resolution prescribe the composition of the Nominating Committee and the manner in which the preceedings of the committee shall be conducted.

4.6 Removal from Office

Any directors may be removed from office with cause by a vote of at least two-thirds (2/3) of the directors present at any regular meeting of the Board. Cause for removal shall include but not be limited to three consecutive absences of a director from regular or special meetings of the Board.

4.7 Vacancies

The Board of Directors shall have the power to fill any vacancy occurring in the membership of the Board at any time other than the expiration of a term or any directorship to be filled by reason of any increase in the number of directors. The director elected to fill a vacancy shall be elected from the unexpired term of his/her predecessor in office.

4.8 Meetings

4.8.1 Regular Board Meetings

Regular meetings of the Board of Directors shall be held at such times and at such places within the State of Washington as the Board shall determine by adopting a schedule of regular meetings.

4.8.2 Special Board Meetings

Special Board meetings may be called by the President or by a majority of directors. Special Board meetings shall be held within the State of Washington, at such time and place as designated by the person or persons calling the meeting. Any business may be conducted at a special meeting.

4.8.3 Notice

No notice of a regular Board meeting is required. Notice of a special Board meeting shall be given verbally at least 24 hours prior to the time of the meeting. Such notice may be given verbally rather than in written form. Notice, if written, may be delivered personally or by mail and, if mailed, the notice shall be deemed delivered two days after deposit in the United States mail addressed to the director at his/her address as it appears in the records of the corporation, postage prepaid. Neither the business to be transacted at, nor the purpose of, any special meeting of the Board need be specified in the notice.

4.8.4 Quorum and Voting

The presence of a majority of directors shall constitute a quorum for the transaction of business. Each director shall possess one vote as to all matters coming before the Board. Voting by proxy is not authorized. The act of the majority of the directors present shall be the act of the Board of Directors, unless the act of a greater number is required by the Articles of Incorporation, by law or by other provisions of these bylaws.

4.9 No Compensation for Directors

A Director shall not be compensated for serving as a director but may be reimbursed for expenses incurred in carrying out his/her duties as a director. Reimbursement for expenses shall be subject to prior approval of at least three executive officers.

4.10 Executive Board

The executive Board shall represent and act for the Board of Directors between meetings of the Board of Directors on matters of policy and procedure which are of interest to the corporation and shall have all powers and duties as may be, from time to time, delegated to the Executive Board by the Board of Directors. The Executive Board shall consist of The President, the Vice President, The Secretary, The Treasurer and the Past President. Action by the Executive Board shall require the vote of a majority of the members thereof.

ARTICLE V. OFFICERS

5.1 Executive Officers

The executive officers of the corporation shall consist of the President, the Vice President, the Secretary, the Treasurer, and such other officers and assistant officers as may be deemed necessary by the Board of Directors, each of whom (except the Past President). The executive officers shall serve without compensation. The four executive officers identified above shall be members of the Board of Directors.

5.2 Term of Office of Executive Officers

Executive officers shall be elected to a two year term, subject to each officer's continued membership on the Board of Directors. However, the Past President shall serve a term of two years, irrespective of the term or terms of the President.

5.3 Removal

Any executive officer may be removed with cause by a two-thirds (2/3) vote of the Board of Directors present at any regular or special meeting. Cause shall include but not be limited to three consecutive unexcused absences of the executive officer from meetings of the Board of Directors which, for purposes of this Article 5.3. shall be defined to include meetings of the Executive Board.

5.4 Vacancies

Vacancies in any executive office caused by any reason shall be filled by the Board of Directors at any regular or special meeting by selecting a suitable and qualified person to act during the unexpired term.

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5.5 President

The President shall be the principal officer of the corporation, shall preside when present at all meetings of the members and at all meetings of the Board, and, subject to the Boards control, shall supervise and control all of the business and affairs of the corporation. With the Secretary or other officer of the corporation authorized by the Board, shall sign deeds, mortgages, bonds, contracts or other instruments that the Board has authorized to be executed, except when the signing and execution thereof have been expressly delegated by the Board, by these bylaws or by law to some other officer. In general, the President shall perform all duties incident to the office of the President and such other duties as may be prescribed by the Board from time to time.

5.6 Vice President

In the absence or disability of the President, the Vice President (or in the event of more than on Vice President, the Vice President who was elected to serve as Vice President I) shall be vested with all powers and duties of the President. Vice Presidents shall perform such other duties and have such powers and authority as from time to time may be assigned to them by the President or by the Board.

5.7 Secretary

The Secretary shall see that the minutes of the meetings of the Board are kept, see that all notices are duly given in accordance with these bylaws or as required by law, and, in the absence of contrary direction by the Board, shall execute all deeds, mortgages, bonds, contracts, or other instruments that the Board has authorized to be executed. In general, The Secretary shall perform all duties, incident to the office of Secretary and such other duties as from time to time may be assigned to the Secretary by the President or by the Board. In the absence of the Secretary, an assistant Secretary duly elected by the Board may perform the Secretary's duties.

5.8 Treasurer

The Treasurer shall receive and deposit all monies or funds of the corporation in such depositories as may be selected by the Board and shall disburse the funds of the corporation in the manner directed by the Board. In general, the treasurer shall perform all duties incident to the office of treasurer and other such duties as from time to time may be assigned to the Treasurer by the President or by the Board. In the absence of the Treasurer, an assistant Treasurer duly elected by the Board may perform the Treasurers duties.

5.9 Past President

The Past President shall be the immediate past President of the corporation. The Past President shall perform the functions and duties as agreed upon between the President and the Past President.

5.10 Executive Director

In addition to the executive officers listed above, the Board of Directors shall select an Executive Director who shall be responsible for implementing the policy and programs of the corporation, as set forth by the Board of Directors, Executive Board and members. Such Executive Director shall be the chief administrator of the corporation and shall be administratively responsible to the Board of Directors and the Executive Board as set forth in his/her job description as adopted by the Board.

ARTICLE VI. ADMINISTRATIVE AND FINANCIAL PROVISIONS

6.1 Rules of Procedure

The rules of procedure at Board and committee meetings shall be the rules contained in Robert's Rules of Order, as amended, so far as applicable and when not inconsistant with these bylaws, the Articles of Incorporation, or with any resolution of the Board of Directors.

6.2 Signing Financial Documents

All checks, drafts or other orders for the payment of money and other evidences of indebtedness issued in the name of or payable to the corporation, and any and all securities owned or held by the corporation requiring signature for transfer shall be signed or endorsed by such person or persons and in such a manner as from time to time shall be so authorized and directed by the Board of Directors and, in the absence of any other express authorization, shall be signed or endorsed by the Treasurer. Notwithstanding the foregoing, all expeditures shall have been approved by at least three executive officers.

6.3 Authority to Bind the Corporation

The Board of Directors may authorize any person to execute and deliver any contract or other instruments in the name of and on behalf of the corporation, and such authorization may be general or be confined to specific instances.

ARTICLE VII. Fiscal Year

The Fiscal year of the corporation shall be the calendar year from January 1 through December 31.

ARTICLE VIII. ACTIONS WITHOUT MEETINGS; WAIVER OF NOTICE

8.1 Actions without Meeting

Any action of the membership or directors that is required to be taken at a meeting or that may be taken at a meeting may be taken without a meeting if a consent in writing setting forth the action so taken shall be signed by all of those entitled to vote on the matter. In addition, the Board may by resolution elect to vote by telephone poll on any matter discussed at any regular meeting (including any meeting held pursuant to Article 8.2 below).

8.2 Meetings by Communications Equipment

The directors may participate in a meeting by means of a conference telephone or similar communications equipment so long as all persons participating in the meeting hear each other at the same time. Participation by such means shall constitute presence in person at a meeting.

8.3 Waiver of Notice

Whenever any notice is required to be given to any member or director, a waiver thereof in writing signed by the person entitled to such notice, whether signed before or after the time of the meeting or other matter requiring notice, shall be equivalent to the giving of such notice.

8.4 Waiver of Notice by Attendence

Attendence of a director or a member at any meeting shall constitute a waiver of notice of such meeting except where a director or member attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened.

ARTICLE IX. INDEMNIFICATION OF TRUSTEES

Each director or officer now or hereafter serving on the corporation and the respective heirs, executors and administrators of each of them, shall be indemnified by the corporation against all costs, expenses, judgements and liabilities, including attorneys fees, reasonably incurred by or imposed upon him/her in connection with or resulting from any action, suit or proceeding, civil or criminal, in which he or she is or may be made a party by reason of his or her having been such trustee or officer or by reason of any action alleged to have been taken or admitted by him or her as such trustee except in relation to matters as to which he or she shall be finally adjudged to have been liable for willful misconduct in performance of his or her duties as such trustee, director or officer. The foregoing right of indemnification shall not be exclusive of other rights to which such director, trustee or officer may be entitled as a matter of law or under any bylaw, agreement, vote of the Board of Directors, vote of the members or otherwise.

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ARTICLE X. AMENDMENTS TO BYLAWS

The Bylaws may be altered, amended, repealed or suspended by a majority vote of the Board of Directors at any meeting at which a quorum is present if such proposed action has been placed on the agenda for such meeting and notice thereof has been given to each member of the Board of Directors at least two weeks on advance.

These bylaws were adopted by the Board of Directors of the corporation on August 21, 1989, at Seattle, Washington.

Authorized signature(s)

Treasurer Ivo Carter

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9204091399 4

M.J. Dunn to FEC
In Re MUR 3177
(4)

Inside: A Letter from Prison

One Dollar "Charting the course of freedom in the Northwest." SEPT 1985

The Washington Libertarian

Seattle to host LP Presidential Convention

As a result of some unexpected developments Seattle will be the host city for the next Libertarian Party Presidential Nominating Convention. LP Committee members at the August National Convention in Phoenix, Arizona chose Seattle by a better than two to one vote margin over San Antonio, Texas. The California/Nevada team which was originally chosen to organize this event in Reno announced a few weeks prior to the Phoenix Convention that they would be unable to do so.

Skip Barron, organizer of the First Northwestern Freedom Conference in Seattle last April, will head the organizing team for the LP PresCon. He says that we can expect four to five hundre delegates for this event plus hundreds more attendees. Skip is also planning another Northwestern Freedom Conference, tentatively scheduled for the Fall of 1986.

The date of the LP PresCon is still pending. Committee members will decide at their December meeting in Houston whether to schedule it for August of 1987, the usual time, or postpone it until April of 1988. The latter date coincides with the primaries of the major parties. Some Party officials believe that the LP can benefit from this change of timing in terms of publicity.

In other business in Phoenix our State Chair, Ruth Bennett was reelected as an At-Large member of the NatCom. Jim Turney of Virginia was elected to replace Randy Ver Hagen as LP Chair. Sharon Ayres, wife of David Bergland, was elected Vice Chair. Perry Willis, who replaced Honey Lanham as National Director will continue in that capacity.

The Phoenix Convention is reported to have been attended by 550 people, including 250 delegates. This was far below the hoped for attendance. It is speculated that the hot weather and rather high Convention package prices discouraged many from coming. Seven delegates from Washington State attended.

Andre Marrou visits Seattle

Andre Marrou, LP State Legislator from Alaska, was in Seattle early last month to attend the 11th annual Conference of State Legislators. The Conference was attended by 5,000 legislators, aides, and lobbyists. It consisted of various panels and committees which discussed problems, proposed solutions, and generally gave lobbyists ample opportunity to jockey for favors.

Libertarian Andre Marrou said he was a lone voice for freedom in a sea of statism. However he was interviewed by Associated Press and made a resolution which passed the steering committee to declare Thomas Jefferson's birthday, April 13, a national holiday.

The 46 year old Marrou was later honored at a small party by Libertarian well wishers in King County. Marrou related his experiences as 3rd LP State Legislator in Alaska (and the U.S.). He said that when clear cut libertarian issues can be brought before the voters, such as the Alaska LP sponsored deregulation of Alaska Transportation Commission, they almost always pass.

Marrou believes that his chances for reelection are excellent and he encouraged Party members present to become more active in running for office.

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M.J. Dunn to FEC
In Re MUR 3177
f. (e)

One Dollar "Charting the course of freedom in the Northwest." FEB 1986

The Washington Libertarian

2204091399 7

LP PresCon set for Sept. '87

The LP National Committee chose September 3 to 6, 1987 for the date of the LP Presidential Nominating Convention. The date was chosen at the December 7, meeting of the NatCom in Houston Texas. The site of the convention is to be Seattle.

Activities for this major LP event are being coordinated by National Committee representative (and LPWS founder) H.W. "Skip" Barron. Proposed activites are a fundraising dinner, an outdoor excursion, and Puget Sound dinner cruise. Other educational workshops and panels will also be included.

The exact site for the convention has been narrowed down to either the Sheraton or Westin hotel in downtown Seattle.

Advance publicity for this event was received in the Tacoma News Tribune's column by Peter Callaghan. In his November 24 article titled, *"Libertarians: Trivial pursuit or viable party?"*, he wrote *"And while the Democrats and Republicans are a long way away from considering Seattle as a site for their presidential nominating conventions, the city will be the site for the Libertarian nominating convention in 1987."*

The remainder of the article discussed the campaigns of Karen Allard (Tacoma School Board, 1985) and Mac Barnette (State Treasurer, 1984) and comments by Andre Marrou, LP legislator from Alaska.

Convention organizing will be centered in King County. The planning committee meets twice monthly. These meetings are restricted to committee members only. Those wishing to help with Convention preparations should contact Skip Barron at 789-4812 or Dave Jones, King County LP Chair at 271-4236, or attend the King County LP meeting (See *Freedom Calendar*). Committee members are receiving free passes to all Convention activities *in exchange for their work*.

A contest is being conducted to find a theme and logo for the 1987 LP Convention. Submissions should include simple catch phrases and diagrams for a Convention logo or design. The winner(s) will receive a free LP PresCon pass to all activities. Winners will be chosen by the Convention Committee. More than one submission is allowed. They should be sent to: *Convention Theme, c/o The Washington Libertarian, P.O. Box 23108, Seattle, WA 98102.* Deadline for entries is April 30.

News briefs

LP TV ads

Andre Marrou's fundraising tour for Libertarian Party TV commercials raised $7,000. The first stop of his eight city tour was Seattle on November 7.

It is estimated that an additional $9,000 will be needed to complete production of the first two ads. These ads will be taken on the road for further fundraising to raise the capital for a professional test marketing. The end result should be an ongoing LP TV campaign.

The TV ad committee is conducting a design competition. All competition submissions should be complete scripts; pictures to be seen on the screen and words to be spoken. They should fit a 30 or 60 second time slot. The purpose of the ads should be to induce the viewer to call an 800 number, rather than serve an educational purpose. Multiple sets and special effects should not be utilized.

Submissions will not be returned, but a winner will be announced in LP NEWS.

Mail entries or contributions to: *LP Headquarters, 7887 Katy Fwy. #385, Houston, TX 77024*. For more information call 713-686-1776.

Al Swift shows colors

DeAnn Pullar, Vice-chair of the Whatcom County Libertarian Party, met with Al Swift on Jan. 7, to discuss HR 2320. Al Swift is the Chair of the House Elections Subcommittee.

Swift stated that he would not schedule hearings on the bill because; 1) there are no cosponsors on the Subcommittee, 2) Congressional support is not widespread but concentrated within Jesse Jackson's "Rainbow Coalition" and, 3) not enough public support has been demonstrated.

Swift's personal viewpoint, however, shone through the interview. He said, "There

continued on page 2

9204091399 8

N.J. Dunn to FEC
In Re MUR 3177
Ref. (f)

Inside: TOMMY'S DECLARATION

One Dollar "Charting the course of freedom in the Northwest." OCT 1986

The Washington Libertarian

2409139999

Jack Allard May Become First Elected Libertarian in State

Jack Allard of Tacoma advances from the primaries to face Bud Kinsman in the general elections for a seat on the Pierce County Charter Review Committee, a non-partisan race.

Allard ran in a field of seven candidates from District 7, Position 2, coming in second with 20% of the vote (1,684) against Kinsman's 23% (1,768). This places him in the most hopeful position any Party member has yet achieved to become the first elected Libertarian in Washington State. As such this race has high strategic value in establishing the political credibility of the state Libertarian Party.

The primary results are startling as Allard has been involved with little campaigning or community activism compared to his opponent. It is believed that the name recognition of his wife Karen was a factor in his success at the polls. This confirms the wisdom reported by other state LP organizations that small non-partisan races offer the best electoral hopes for Libertarians and that the name recognition (individual or party) from a higher level race helps lower level races.

Karen Allard is a frequent candidate for State House in the same district. She polled 2½% in the primaries and will be on the ballot in the general election.

Pierce County Libertarians will be concentrating on Jack Allard's campaign with lawn signs and mailings. Those wishing to assist in this important campaign should contact the Allards at 759-1838.

In other races former LPWS chair DeAnn Pullar received 33% of the primary vote in her race for State House as a Republican. The Republican state committee is reportedly unhappy with the results and is reluctant to commit more resources to her campaign.

Dave Roberts did not survive the primaries in his bid for a seat on the Pierce County Charter Review

From the Chair

Alaska, Defectors, Etc.

For the entire month of July, I and two other Partners In Crime sandwiched ourselves into a four-wheel-drive Subaru wagon and braved the wilds and Winnebagos of the Alaska Highway to experience for ourselves the last bastion of the Yankee ideals of liberty and rugged individualism. True road animals that we were, the trip from Seattle to Fairbanks took a mere four days, over a road that, to our pleasant surprise, was about 95% paved; the only major obstacles were the seemingly endless number of motor homes and other R.V.'s that impeded our efficient progress, the drivers of which had an average age somewhere in the upper seventies. For some reason, we always met up with them at a time when the already two-lane highway was going up a steep hill with numerous switchbacks, or when the pavement turned to dirt, and the attendant dust was so thick, visibility was reduced to almost nothing.

These things were expected. However, our first real clue that something was seriously amiss in Paradise was at the Alaska-Yukon border, when we reentered U.S. territory. The border guard looked us over, asked the usual mundane questions, and then, as he waved us through, wryly said, "Well, I guess this'll be the last friendly face you'll see for awhile!" He was right.

As the Great Alaska Oil Grab of '76 turned into the Great Alaska Oil Bust of '86, people started losing jobs by the truckload and began to line up for the next handout, which of course has yet to arrive. This socio-economic malaise was most felt in the Fairbanks region, as evidenced by the general surliness of the locals towards anyone with out-of-state plates or a funny accent, in spite of the fact that tourism was the new growth industry in Alaska (the only one). By contrast, Anchorage has yet to feel the full effects of the petrodollar drought--there are

continued on page 2

9204090140000

M.J. Dunn to FEC
In Re MUR 3177
Ex. (f)

Save 30%

Buy Liberty Bucks for The Culture of Freedom!

You can save up to 30% on the 1987 Libertarian National Convention with your advance purchase of Liberty Bucks.

These attractive notes are offered at 20% off their face value. They will be honored at full value in exchange for convention tickets, estimated at $300, and all products, services, and special events offered by the convention sponsors. A further discount of 10% is available for advance convention registration in July 1987.

The Liberty Bucks design is based on old private banknotes. They come in denominations of ones, twos, fives, tens, and twenties. They are individually signed and serialized for ours and your security.

Plan ahead for your week of pure liberty in Seattle!

Please send me the following package of Liberty Bucks.

- ☐ 300 Bucks @ $240
- ☐ 150 Bucks @ $120
- ☐ 75 Bucks @ $60
- ☐ Other. Enclosed is _____ for a Liberty Buck package at 20% off.

Name _____

Address _____

City _____

State/Zip _____

Phone _____

Make checks payable to:
LPWS Convention Services
P.O. Box 23108
Seattle, WA 98102

The Culture of Freedom

No refunds or cash redemptions. Current discount rates expire Dec 31 1986

2240914001

9204090140002

M.J. Dunn to FEC, In Re MUR 317
Ref. (g)

Inside: Custom-making a Movement

Northwest Libertarian

Newsletter of the Libertarian Party of Washington State

Dec/Jan | One Dollar | 1987

Ron Paul for President

by Paul Jacob

Will former Congressman Ron Paul of Texas run for President on the Libertarian ticket? I hope so. The LP has had its problems finding candidates that have expertise at campaigning, mainstream credibility, and a solid Libertarian philosophy. Dr. Ron Paul has all three of these.

Plus, if he runs, then I can finally put a "Paul for President" bumper sticker on my car.

Seriously, a Ron Paul campaign could bring back for us the visibility and momentum we lost between 1980 and 1984 and are just now very slowly regaining. Visibility is one reason we are often believed to be the party of Lyndon LaRouche. (is he a Republican-Democrat plot or what?)

While we were the most visible alternative to the major (old) parties in 1980 with dozens of prime-time TV ads that helped us garner almost a million votes, it was LaRouche who was all over the television in 1984. When people see an alternative with the ability to be on TV, they immediately think it's the Libertarians. Even if this perception by the public has hurt at times, it certainly is not a bad thing.

Television is expensie but it's essential if we are to reach people. Running ads only on cable and then only very late in the campaign in 1984, we ended up with less than 250,000 votes. Reaching people is the whole ballgame. Ron Paul can raise the money to do it.

"The State is a threat to every single solitary person in this country."

Ron Paul

What would cause Paul not to run? The fear that there will be more of the factionalism and childish egoism that caused the Party to focus inwardly at the expense of outreach and growth, that sapped the strength of many an activist, and that led to a full-fledged split in the Party at the 1984 convention. I'm not suggesting that fierce argument and discussion should stop or lessen even a single degree, but we cannot afford to become a debating society—especially an unfriendly one.

I'm certain Ron Paul wants to know that the Libertarian Party is truly committed to taking its message to the people; not to purges or staging power plays or bickering internally. What do you say? Is the message of liberty in the eyes and ears and minds of 250 million Americans worth forgoing pettiness?

Be glad. My sense is that Paul will seek the nomination. At my July 1985 trial in Little Rock, Arkansas for having refused to register for the draft, Dr. Paul had this to say: "...the State is massive...the State is now encroaching on our personal liberties, it's encroaching throughout the world on a daily basis...and also in the economy. I think the State itself is a threat to us. It's a threat to the individual liberties, not only of Paul Jacob, but of *every single solitary person in this country.*"

Ron Paul was there to testify when I needed him; he'll be there in 1988 because the cause of liberty needs him.

[Paul Jacob is a member of the Libertarian National Committee and president of Volunteers for America, *an anti-draft educational group in Washington D.C. Jacob spent almost 6 months in federal prison for resisting draft registration.]*

Bennett Chosen NatCom Rep

Skip Barron, long time representative to the Libertarian National Committee for Oregon and Washington, was replaced by Ruth Bennett in an action taken by the LPWS Executive Committee on Nov. 16, the day after the November meeting of that committee.

Barron had been technically removed from his position several months ago when he was unable to attend the summer meeting of the National Committee in Baltimore. Bennett volunteered to attend the meeting in his absence and was seated as the Region 3 Representative.

When Barron again announced his inability to attend the

continued on page 2

P2040140003

9204091400 4

M.J. Dunn to FEC
In Re MUR 3177
[illegible]. (g)

Freedom Calendar

DEC 16, Tuesday 7:00 PM - The King County LP meets at the Deluxe II Bar & Grill, 5401 26th NE (N. of Univ. Village Mall) in Seattle. For more information call Dave Jones at 271-4236.

DEC 20, Saturday - The LPWS Executive Committee meets in Seattle. For time and location contact Tom Olson at 937-9759.

JAN 20, Tuesday - The King County LP meets in Seattle. For time and location contact Dave Jones, 271-4236.

JAN 28, - Deadline for the February Issue of Northwest Libertarian.

Seattle, Washington Store:
3929 Aurora Ave. N.
Seattle, WA 98103
1-206-632-8538

Portland, Oregon Store:
10929 N.E. Sandy Blvd.
Portland, OR 97220
1-503-254-7466

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"A little rebellion now and then is a good thing, and as necessary in the political world as storms in the physical."

Thomas Jefferson, 1787

Libertarian Party of Washington State
P.O. Box 23108
Seattle, WA 98102

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ADDRESS CORRECTION REQUESTED

92040914005

AGENDA DOCUMENT #92-43

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

May 27, 1992

JUN 2 1992

EXECUTIVE SESSION

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

Lois G. Lerner
Associate General Counsel

SUBJECT: Matters Under Review and Exercise of Prosecutorial Discretion

I. BACKGROUND

In April 1992 this Office circulated a memorandum to the Commission containing a list of cases which we believed warranted the exercise of prosecutorial discretion by the closing of the file. The memorandum also invited the Commission to suggest additional cases for consideration of such action. Presented below are the cases included in our memorandum as well as those suggested to us by a Commissioner for inclusion (as denoted by an asterick).

This report recommends closing certain matters, not closing others, and holding one matter in abeyance. This Office's recommendations as to whether the file should be closed in each matter reflect numerous factors including our present workload, the age of the case, the amount of financial activity involved, and the seriousness of the violation. Closing cases under these circumstances should not necessarily be seen as a decision on how to handle similar cases in the future.

2140914006

PAGES 2-4 AND 7-32 DO NOT PERTAIN TO THESE RESPONDENTS.

9204090140007

3) **MUR 3177 (E) - National Libertarian Committee and William Redpath, as treasurer IHF, Successor to LPWS-CSG (Opened 11-16-90)**

A complaint was filed with the Commission regarding the failure of the Libertarian Party Washington State-Convention Services Group ("LPWS-CSG") to register with and file reports regarding their activities during the 1987 National Libertarian Nominating Convention. LPWS-CSG, now known as the Invisible Hand Foundation ("IHF"), is a Washington corporation which was set up for the purpose of planning and handling the events of the Libertarian's 1987 Nominating Convention in Seattle, Washington. The National Libertarian Committee awarded the convention contract to LPWS-CSG but no written contract was ever signed.

In its report to the Commission, this Office concluded that the financial activity of the convention should have been reported to the Commission. It appears that LPWS-CSG had gross sales of $133,124 and total expenses of $111,119 for the convention, resulting in a surplus of $22,015. However, no financial activity was reported by LPWS-CSG to the Commission. The National Libertarian Committee reported their payments to LPWS-CSG for their convention services.

This Office also concluded that if LPWS-CSG were not an arrangements committee but a vendor that was acting as an independent contractor, then LPWS-CSG was not required to file reports with the Commission. However, the responsibility for filing reports would then shift to the Libertarian National Committee because the financial activity had to be reported by someone.

On June 4, 1991, the Commission found reason to believe that the National Libertarian Committee and its treasurer, and IHF violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b).

There is conflicting evidence as to whether LPWS-CSG was in fact an arrangements committee for the National Libertarian Committee. It appears that many of the key people in LPWS-CSG were members of the Libertarian Party of Washington State, suggesting a possible link. However, LPWS-CSG asserts that it was acting as an independent contractor and has no other connection to the National Libertarian Committee.

This Office notes that Section 437 makes it clear that an arrangements committee is required to report the financial activity regarding a convention. However, Section 437 and the regulations do not address whether the responsibility for filing shifts to the national committee when the arrangements committee does not file or when the entity handling the convention is not an arrangements committee. Moreover, resolving the question whether the group was or was not an independent contractor would require a protracted investigation.

7240214003

In light of the circumstances of this matter, the General Counsel's Office believes further use of our limited resources to pursue this matter is not warranted. Therefore, we recommend that the Commission take no further action and close the file in this matter.

2204071400?

III. RECOMMENDATIONS

1. Take no further action and close the file in:
   a) MUR 3177
   b) MUR 3419
   c) MUR 2745
   d) MUR 2934
   e) MUR 3099
   f) MUR 3127
   g) MUR 3271
   h) MUR 3371
   i) MUR 3441
   j) MUR 3482
   k) MUR 3151
   l) MUR 3239

2. Decline to open a Matter Under Review in:
   a) RAD Referral 92NF-02
   b) RAD Referral 91L-76
   c) Pre-MUR 245

3.

4. Approve the appropriate letters containing admonishment language.

2204091401O

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	Agenda Document
Matters Under Review and Exercise	)	#X92-43
of Prosecutorial Discretion	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 2, 1992, do hereby certify that the Commission took the following actions with respect to the above-captioned matters:

1. Decided by a vote of 5-0 to

   a) Take no further action and close the file in MUR 3177, MUR 3419, MUR 2745, MUR 3099, MUR 3127, MUR 3271, MUR 3371, MUR 3441, MUR 3482, MUR 3151, and MUR 3239.

   b) Decline to open a Matter Under Review in RAD Referral 92NF-02, RAD Referral 91L-76, and Pre-MUR 245.

   c)

   d) Approve the appropriate letters containing admonishment language, as recommended in the General Counsel's report dated May 27, 1992.

   Commissioners Aikens, Elliott, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present at the meeting.

(continued)

92040921401

2. Decided by a vote of 4-0 to take no further action and close the file in MUR 2934.

Commissioners Aikens, Elliott, McGarry, and Thomas voted affirmatively for the decision. Commissioner McDonald was not present at the meeting. Commissioner Potter recused with respect to MUR 2934 and did not cast a vote.

Attest:

6-4-92
Date

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

9240014012

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alan Lindsay
2300 Lazy Hollow, #330-D
Houston, TX 77063

RE: MUR 3177

Dear Mr. Lindsay:

This is in reference to the complaint you filed with the Federal Election Commission on November 12, 1990, concerning the Libertarian National Committee and the Invisible Hand Foundation, Successor to LPWS-CSG.

Based on that complaint, on June 4, 1991, the Commission found that there was reason to believe the Libertarian National Committee and Invisible Hand Foundation, Successor to LPWS-CSG violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b), provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. However, after considering the circumstances of this matter, the Commission determined on June 2, 1991, to exercise its prosecutorial discretion and to take no further action against the Liberation National Committee and Invisible Hand Foundation, Successor to LPWS-CSG and close the file. This matter will become part of the public record within 30 days. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Taksar

Mary Taksar
Attorney

Attachment
General Counsel's Report

2240401403

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Jack Allard

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2204021401 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Karen Allard

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2204091401 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Ruth Bennett

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2234091401016

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

William Bradford
c/o Liberty Magazine
P.O. Box 1167
Port Townsend, WA 98368

RE: MUR 3177

Dear Mr. Bradford:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

2040714017

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Bettina Carter

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2240714013

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

William Redpath, Treasurer
Libertarian National Committee
1528 Pennsylvania Avenue, S.E.
Washington, D.C. 20003

RE: MUR 3177
Libertarian National Committee
and William Redpath, as treasurer

Dear Mr. Redpath:

On June 4, 1991, the Libertarian National Committee was notified that the Federal Election Commission found reason to believe that the Libertarian National Committee and its treasurer violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). On July 22, 1991, you submitted a response to the Commission's reason to believe findings.

After considering all the circumstances of the matter, and in the exercise of its prosecutorial discretion, the Commission determined on June 2, 1992, to take no further action against Libertarian National Committee and William Redpath, as treasurer, and closed the file. The Commission reminds the Libertarian National Committee and you, as treasurer, however, that failing to report receipts and disbursements from convention activity may be a violation of 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). You should take immediate steps to insure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

2040214019

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Taksar
Attorney

Attachment
General Counsel's Report

22044091400620

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Michael Holmes
21715 Park Brook Drive
Katy, TX 77450

RE: MUR 3177

Dear Mr. Holmes:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

2204091402 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
David Jones

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2204021402

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Honey Lanham
4327 Sexton
Dallas, TX 75229

RE: MUR 3177

Dear Ms. Lanham:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esquire
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Richard Shepard

Dear Mr. Sailer:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar
Attorney

2240211402 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

James Turney
2214 Hay Road
Richmond, VA 23224

RE: MUR 3177

Dear Mr. Turney:

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 me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1992

Robert O. Sailer, Esq.
Sailer & Co., P.S.
16770 N.E. 79th Street
Suite 205
Redmond, WA 98052

RE: MUR 3177
Invisible Hand Foundation
Successor to LPWS-CSG

Dear Mr. Sailer:

On June 4, 1991, your client was notified that the Federal Election Commission found reason to believe that the Invisible Hand Foundation, Successor to LPWS-CSG violated 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b), and 11 C.F.R. § 9008.12(b). On July 10, 1991, you submitted a response to the Commission's reason to believe findings and interrogatories.

After considering all the circumstances of the matter, and in the exercise of its prosecutorial discretion, the Commission determined on June 2, 1992, to take no further action against Invisible Hand Foundation, Successor to LPWS-CSG and closed the file. The Commission reminds Invisible Hand Foundation, Successor to LPW-CSG, however, that failing to report receipts and disbursements from convention activity may be a violation of 2 U.S.C. § 437, 11 C.F.R. § 9008.1(b) and 11 C.F.R. § 9008.12(b). You should take immediate steps to insure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

2204021140026

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Taksar

Mary Taksar
Attorney

Attachment
General Counsel's Report

24409140027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

June 30, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael Dunn
3933 South 326th Place
Auburn, WA 98001-9639

RE: MUR 3177

Dear Mr. Dunn:

This is in reference to the submission you filed with the Federal Election Commission on January 6, 1992, concerning MUR 3177.

After conducting an investigation in this matter, the Commission decided on June 2, 1992 to exercise its prosecutorial discretion and take no further action in this matter. Accordingly, the Commission closed the file in this matter on June 2, 1992.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Taksar

Mary Taksar
Attorney

Attachment
General Counsel's Report

2204071403

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3177

DATE FILMED 7/13/92 CAMERA NO. 3

CAMERAMAN EES

2140114029

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3177.

7/20/92

92040921745

7 July 1992
3933 S. 326th Place
Auburn, WA 98001-9639

Mary Taksar
FEDERAL ELECTION COMMISSION
Office of General Counsel
999 E Street N.W.
Washington, DC 20463

92 JUL 14 AM 11:54
RECEIVED
FEDERAL ELECTION COMMISSION

Dear Ms. Taksar,

I am writing to thank you for providing me the General Counsel's report regarding MUR 3177. However, I have some questions concerning this disposition.

Firstly, do I properly understand the implications of this report's recommendations: that a political party can successfully conduct a presidential nominating convention and not be liable to report the finances of that convention to the Federal Election Commission, so long as the parties actually in charge of conducting the business aspects of the convention do not have any formal or contractual relationship to the political party? In short, will it be possible for the Libertarian Party to avoid reporting such future conventions to the FEC so long as the "circumstances" of MUR 3177 are duplicated? Or, will it be possible for emergent third parties (such as the rumored "Independence Party", formed to support Ross Perot) to employ this dodge?

Secondly, in view of the above implication, I do not understand how the FEC can ignore and neglect your own determination that The Invisible Hand Foundation violated 2 USC § 437, 11 CFR § 9008.1(b), and 11 CFR § 9008.12(b).

Thirdly, it appears to me that there is no reason to suspend a conclusion as to the responsibility of the various parties, on the contention that it would be unreasonably difficult to determine whether the IHF had been an "arrangements committee" or an "independent contractor." I submit the following argument to support the contention that the IHF was an arrangements committee: (a) Because there was no contract signed between the National Libertarian Party and the LPWS-CSG, nor any basis of verbal contract, *ipso facto* LPWS-CSG could not have been an "independent contractor." (b) The Libertarian Party of Washington State was an appendage or subdivision of the National Libertarian Party through the fact of being an "Affiliate Party", as defined in the National Party By-Laws, to which all Affiliate Parties are subject (copy enclosed, see Article 7). The LPWS-CSG was a subcommittee of the Libertarian Party of Washington State, as substantiated by the following:

- the LPWS-CSG was operating legally under the name of the Libertarian Party of Washington State (LPWS)
- LPWS-CSG funds were mingled for a period of several months in the Libertarian Party of Washington State bank account, which was managed by a person who was treasurer to both organizations (Tina Carter)
- LPWS-CSG business and project policy decisions were made at Executive Committee meetings of the Libertarian Party of Washington State
- the principals of the LPWS-CSG acknowledged (as documented in the minutes of the aforementioned Executive Committee meetings) that any disputes over their handling of the convention project would come under the mediative jurisdiction of the Judicial Committee of the Libertarian Party of Washington State

9204092746

- the convention was announced to its attendees as a project of the Libertarian Party of Washington State (convention flyer)

Logically, if LPWS-CSG was a subcommittee of the LPWS, and the LPWS was a subdivision of the National Libertarian Party, then it follows that LPWS-CSG, absent any contractual relationship to the contrary, was functioning as a subcommittee of the National Libertarian Party and thus is interpretable as an "arrangements committee." I am prepared to support this argument with appropriate documentation.

It should also be pointed out that LPWS-CSG incorporated for the specific purpose of establishing the Libertarian Party of Washington State as the ultimate beneficiary of any profits arising from the 1987 convention. That it failed to fulfill its incorporated purpose is currently the subject of potential legal action against them, and stands in contradistinction to the kinds of liabilities incurred by authentic "independent contractors."

I would greatly appreciate your considered opinion of these arguments.

Yours truly,

Michael J. Dunn

Michael J. Dunn

92040921747

Libertarian Party

BYLAWS AND CONVENTION RULES

Adopted in Convention

Philadelphia, Pennsylvania

September, 1989

BYLAWS OF THE LIBERTARIAN PARTY

ARTICLE 1: NAME

These bylaws shall govern the association known as the "Libertarian Party," hereinafter referred to as the "Party."

ARTICLE 2: PERIOD OF DURATION

The duration of the Party shall be perpetual.

ARTICLE 3: PURPOSES

The Party is organized to implement and give voice to the principles embodied in the Statement of Principles by:

--functioning as a libertarian political entity separate and distinct from all other political parties or movements;

--chartering affiliate parties throughout the United States and promoting their growth and activities;

--nominating candidates for President and Vice-President of the United States, and supporting Party and affiliate party candidates for political office; and,

--entering into political information activities.

ARTICLE 4: STATEMENT OF PRINCIPLES AND PLATFORM

1. The Statement of Principles affirms that philosophy upon which the Libertarian Party is founded, by which it shall be sustained, and through which liberty shall prevail. The enduring importance of the Statement of Principles requires that it may be amended only by a vote of 7/8 of all registered delegates at a Regular Convention.

2. The Party Platform shall include, but not be limited to, the Statement of Principles and the implementation of those principles in the form of planks.

ARTICLE 5: LIBERTARIAN PARTY PROGRAM

1. The National Committee shall adopt and report the LP Program to the membership.

2. The Program recommendation by the National Committee shall be comprised of:

a. a maximum of 10 issues;

b. issues which are currently receiving widespread, national public attention;

c. issues which are readily identifiable by most individuals as matters which affect them personally and directly; and

d. interim or transitional proposals which move toward a libertarian society, which are clearly identified as interim or transitional proposals.

3. The National Committee shall appoint 3 or more individuals to submit draft program planks to the National Committee.

4. Motions to approve planks require a 2/3 vote of the entire National Committee.

5. No proposal shall conflict with the LP Platform.

ARTICLE 6: MEMBERSHIP

1. Members of the Party shall be those persons who have certified in writing that they oppose the initiation of force to achieve political or social goals.

2. Dues for membership in the Party shall be set by the National Committee.

3. Only members whose national dues are current shall be counted for delegate apportionment, and National Committee representation. Only members whose national dues are current shall be eligible to hold National Party offices or be a candidate for President or Vice President.

ARTICLE 7: AFFILIATE PARTIES

1. No person, group or organization may use the name "Libertarian Party" or any confusingly similar designation except an organization to which the Party grants affiliate party status.

2. The National Committee shall charter affiliate parties from any qualifying organization requesting such status in each state, territory and the District of Columbia (hereinafter, state). Organizations which wish to become affiliate parties shall apply for such status on a standard petition form as adopted by the National Committee, which petition shall be signed by no fewer than ten members of the Party residing in the appropriate state. Affiliate party status shall be granted only to those organizations which adopt the Statement of Principles and file a copy of their Constitution and/or Bylaws with the Party Secretary.

3. There shall be no more than one affiliate party in any one state, and the affiliate party shall determine who shall be its delegates to all Regular Conventions.

4. No affiliate party shall endorse any candidate who is a member of another party for public office in any partisan election. No affiliate party shall take any action inconsistent with the Statement of Principles or these Bylaws.

5. The autonomy of the affiliate parties shall not be abridged by the National Committee or any other committee of the Party, except as provided by these Bylaws.

6. The National Committee shall have the power to revoke the status of any affiliate party, for cause, by a vote of 3/4 of the entire National Committee. The affiliate party may challenge the revocation of its status by written appeal to the Judicial Committee within 30 days of receipt of notice of such revocation. Failure to appeal within 30 days shall confirm the revocation and bar any later challenge or appeal. The National Committee shall not revoke the status of any affiliate party within six months prior to a Regular Convention.

The Judicial Committee shall set a date for hearing the appeal within 20 to 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and submit evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's revocation of affiliate party status or order reinstatement of the affiliate party. The Judicial Committee shall issue its ruling within 30 days of the hearing and in no case later than 90 days prior to a Regular Convention. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's revocation of affiliate party status except when the last day of the 30 day period falls within 90 days prior to a Regular Convention, in which case the Judicial Committee's non-action shall result in reinstatement of affiliate party status.

ARTICLE 8: OFFICERS

1. The officers of the Party shall be:

-- Chair,
-- Vice-Chair,
-- Secretary, and
-- Treasurer.

All of these officers shall be elected by a Regular Convention of the Party, shall take office immediately upon the close of the Convention and shall serve thereafter until the final adjournment of the next Regular Convention. No person shall serve as an officer who is not a member of the Party.

2. No offices shall be combined.

3. The officers shall be full voting members of the National Committee.

4. The Chair shall preside at all Conventions and all meetings of the National Committee. The Chair is the chief executive officer of the Party with full authority to direct its business and affairs, including hiring and discharging of National Committee volunteers and paid personnel, subject to express National Committee policies and directives issued in the exercise of the National Committee's plenary control and management of Party affairs, properties and funds.

5. The Vice-Chair shall be the chief assistant to the Chair, performing such duties as the Chair shall prescribe, and holding such executive powers as the Chair shall delegate and shall perform the duties of the Chair in the event that the Chair is, for any reason, unable to perform the duties of the office.

6. The Secretary shall be the recording officer of the Party and shall perform such duties as are assigned by the Chair or the National Committee. The Secretary shall attend all meetings of the National Committee and all Party Conventions and shall act as Secretary thereof, keeping such minutes and records as necessary. The Secretary shall make an annual report to the National Committee containing all information required by the Committee.

7. The Treasurer shall receive, expend and account for the funds of the Party under the supervision and direction of the Chair and the National Committee. The Treasurer shall make an annual financial report to the National Committee and shall perform all duties required of the office by applicable federal and state law.

8. The National Committee may, for cause, suspend any officer by a vote of 2/3 of the entire National Committee. The suspended officer may challenge the suspension by an appeal in writing to the Judicial Committee within seven days of receipt of notice of suspension. Failure to appeal within seven days shall confirm the suspension and bar any later challenge or appeal.

The Judicial Committee shall set a date for hearing the appeal between 20 and 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and present evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's suspension of the officer or order the officer's reinstatement within 30 days of the hearing. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's suspension of the officer. At such time as the suspension is final, the office in question shall be deemed vacant.

9. The National Committee shall appoint new officers if vacancies occur, such officers to complete the term of the office vacated.

ARTICLE 9: NATIONAL COMMITTEE

1. The National Committee shall have control and management of all the affairs, properties and funds of the Party consistent with these Bylaws. The Libertarian National Committee shall establish and oversee an organizational structure to implement the purposes of the Party as stated in Article 3. The National Committee shall adopt rules of procedure for the conduct of its meetings and the carrying out of its duties and responsibilities. The National Committee may delegate its authority in any manner it deems necessary.

2. The National Committee shall be composed of the following members:

a. the officers of the Party;

b. five members elected at large by the delegates at a Regular Convention; and

c. any additional members as specified below:

Any affiliate party with 10% or more of the total national party membership (as determined for delegate allocation) shall be entitled to one National Committee representative and one alternate for each 10% of national membership.

Affiliate parties may, by mutual consent, band together to form "representative regions," and each such "region" with an aggregate national party membership of 10% or more shall be entitled to one National Committee representative and one alternate for each 10% of national party membership.

"Representative regions" may be formed or dissolved once every two years during a period beginning 90 days before the beginning of and ending on the second day of the National Convention, and notice of new formations or dissolutions must be given in writing to the national Secretary prior to the close of the Convention at which they take place.

3. The National Committee shall take office immediately upon the close of the Regular Convention at which they are selected, and serve until the final adjournment of the next Regular Convention.

4. A National Committee member shall be a member of the Party, and shall not be the candidate of any party except the Party or an affiliate.

5. The National Committee may, for cause, suspend any member-at-large by a vote of 2/3 of the entire National Committee. The suspended member-at-large may challenge the suspension by an appeal in writing to the Judicial Committee within seven days of receipt of notice of suspension. Failure to appeal within seven days shall confirm the suspension and bar any later challenge or appeal.

The Judicial Committee shall set a date for hearing the appeal between 20 and 40 days of receipt of the appeal and shall notify all interested persons, which persons shall have the right to appear and present evidence and argument. At the hearing the burden of persuasion shall rest upon the appellant. The Judicial Committee shall either affirm the National Committee's suspension of the member-at-large or order reinstatement of the member-at-large within 30 days of the hearing. Failure of the Judicial Committee to rule within 30 days shall constitute an affirmation of the National Committee's suspension of the member-at-large. At such times as the suspension is final, the office in question shall be deemed vacant.

6. The National Committee shall appoint new officers and members-at-large if vacancies occur, such officers and members-at-large to complete the term of the office vacated.

7. A National Committee Regional Representative may be removed and replaced only by the act of the affiliate parties which constitute the subject region. The voting procedure for the removal and replacement of regional representatives shall be determined by the regions. In the absence of any such procedures, a majority vote of the state chairs shall prevail.

8. The National Committee shall meet at such times and places as may be determined by:

-- action of the Committee,
-- call of the Chair, or
-- written request of 1/3 or more of its members.

9. The National Committee may, without meeting together, transact business by mail. The Secretary shall send out mail ballots on any question submitted by the Chair or by at least 1/5 of the members of the Committee. Fifteen days shall be allowed for the return of the votes cast, by mail, to the Secretary. The Secretary shall establish procedures for identifying voters in a mail ballot, and may accept votes through any mail system, including facsimile and electronic mail, for which such procedures have been established. Votes from alternate regional representatives will be counted, in accordance with the ranking procedure of the region, only if the regional representative fails to respond to the ballot. If, at the expiration of the applicable period, a quorum of the Committee have not returned their votes, the measure being voted upon shall be deemed to have failed; in all other cases, a majority of the votes returned shall carry the measure, except where a higher vote is required by the Bylaws. The Secretary shall preserve all such votes until the next meeting of the National Committee, at which meeting the Committee shall order the disposition of such votes.

10. A majority of the membership of the National Committee shall constitute a quorum for the transaction of business at all meetings.

11. Upon appeal by 5% of the Party members, the Judicial Committee shall consider the question of whether or not a decision of the National Committee contravenes specified sections of the Bylaws. If the decision is vetoed by the Judicial Committee, it shall be declared null and void.

ARTICLE 10: JUDICIAL COMMITTEE

1. The Judicial Committee shall be composed of seven Party members elected at each Regular Convention, and any five members shall constitute a quorum. No member of the National Committee may be a member of the Judicial Committee. The members of the Judicial Committee shall select the Chair of the Judicial Committee. The Judicial Committee shall take office immediately upon the close of the Regular Convention at which elected and shall serve until the final adjournment of the next Regular Convention.

2. The subject matter jurisdiction of the Judicial Committee is limited to consideration of only those matters expressly identified as follows:

a. suspension of affiliate parties (Article 7, Section 4),

b. suspension of officers (Article 8, Section 8),

c. suspension of National Committee members-at-large (Article 9, Section 5),

d. voiding of National Committee decisions (Article 9, Section 11),

e. challenges to platform planks (Rule 7, Section 7),

f. challenges to Resolutions (Rule 8, Section 2), and

g. suspension of Presidential and Vice-Presidential candidates (Article 13, Section 5).

3. Within 90 days following the Regular Convention at which elected, the Judicial Committee shall establish Rules of Appellate Procedure to govern its consideration of matters within the scope of its jurisdiction. The existing Rules shall remain in effect until and unless the Judicial Committee submits new proposed rules to the National Committee for approval, which approval shall be deemed given unless denied by a 2/3 vote of the National Committee within 60 days of submission. A copy of the current Rules of Appellate Procedure shall be maintained by the Secretary at the Party Headquarters and shall be available to any member at cost.

ARTICLE 11: FINANCE AND ACCOUNTING

1. The fiscal term of the Party shall begin on January 1 of each year. From January 1 until the National Committee has approved a budget, the Treasurer may authorize expenditures for any item incorporated in the previous year's budget as long as the level of expenditure is consistent with that budget.

2. The National Committee shall cause an efficient double-entry system of accounts to be installed and maintained.

3. All disbursements exceeding $20.00 shall be made solely by check.

4. The National Committee shall have the power to designate the depository of all funds of the Party, and shall appoint such officers and employees as in its judgment may seem advisable to deposit and withdraw funds.

5. The Party shall not borrow in excess of $2,000 total without prior approval by 2/3 vote of the National Committee. This shall not include current operating debt for trade payables.

ARTICLE 12: CONVENTIONS

1. Regular Conventions:

The Party shall hold a Regular Convention every two years, at a time and place selected by the National Committee. Regular Conventions shall be held sometime during the period of July of an odd-numbered year through June of an even-numbered year. All business required to be conducted at Regular Conventions shall be conducted at Regular Conventions only.

2. Non-Regular Conventions:

In any year which does not include a Regular Convention, a non-regular convention may be held at the discretion of the National Committee.

3. Delegates:

a. Delegates shall be required to be members of either the Party or an affiliate party. At all Regular Conventions delegates shall be those so accredited who have registered at the Convention. At all Non-Regular Conventions, any person who wishes to attend may do so.

b. Any federal or state law to the contrary notwithstanding, delegates to a Regular Convention shall be selected by a method adopted by each affiliate party; provided however, that only members of the Party as defined in these Bylaws, or members of the affiliate party as defined in the constitution or bylaws of such affiliate party, or those who have made the certification required by Article 6 of these Bylaws, shall be eligible to vote for the selection of delegates to a Regular Convention.

4. Affiliate Party Delegate Entitlements:

Each affiliate party shall be entitled to send delegates to each Regular Convention on the following basis:

a. one delegate for each 20 members or fraction thereof, of the National Party (at least one such delegate must be a resident of that state); plus

b. one additional delegate for each one percent (1%) (rounded) of the total vote cast for President in that state or district which was received by the Party's most recent candidate for President.

5. Ex-Officio Delegates:

In addition, the following persons shall be ex-officio delegates, automatically entitled to delegate status:

a. National Officers;

b. National Committee members or their alternates;

c. all former Party nominees for the Presidency and Vice-Presidency of the United States; and

d. each state governor, U.S. Representative and U.S. Senator who is a Party member and not affiliated with any other party.

6. Delegate Allocation:

In order to be counted for delegate allocation, membership applications must be sent to the National Headquarters by either the individual member or the affiliate party and received or postmarked no later than the last day of the seventh month prior to the Regular Convention. The Secretary shall make a count of the members qualified under the requirements set forth here, and shall compute the delegate allocations for the affiliate parties. Notification of the membership totals and allocation totals shall be sent by the Secretary to the Chair of each affiliate party no later than the last day of the fifth month prior to a Regular Convention.

A list of the names and addresses of all delegates and alternates chosen by each affiliate party shall be sent to the Secretary no later than one month prior to start of the first general session of the Regular Convention. Amendments to such lists may be made by the affiliate parties until the close of the Credentials Committee meeting preceding the Convention. The number of alternates' names submitted shall not exceed the greater of 50 or the number of delegates allocated. Failure to submit a listing of delegate/alternate names and addresses, as prescribed within these Bylaws, shall cause no delegation to be registered from that affiliate party.

7. Delegate List:

Any Party member shall be provided, upon request and payment of copying and mailing costs, a list of the names and addresses of all elected delegates/alternates to a Convention.

8. Convention Committees:

There shall be a Platform Committee, a Bylaws and Rules Committee and a Credentials Committee for each Regular Convention. The National Committee shall appoint a temporary chair of each committee to serve until each committee selects its own chair.

a. The Bylaws and Rules Committee shall consist of ten Party members appointed by the National Committee no later than three months before a Regular Convention. No more than five of these members shall be members of the current National Committee.

b. The Platform Committee shall consist of 20 members selected as follows:

--One member by each of the ten affiliate parties having the largest memberships as determined for Convention delegate allocations. These shall be selected by each of the affiliate parties no later than one month prior to the Regular Convention.

--Ten members appointed by the National Committee, including no less than five members from states other than the ten having the largest Party memberships. These members shall be appointed no later than three months prior to the Regular Convention.

c. The Credentials Committee, composed of ten members, shall be selected as follows:

--Five members chosen by the National Committee.

--One member by each of the five affiliate parties having the largest memberships as determined for Convention delegate allocations. These shall be selected by each of the affiliate parties no later than one month prior to the Regular Convention.

d. Ranked alternates may be named by the appointing bodies to fill any vacancies in the Convention Committees.

9. Quorum:

A quorum shall consist of 40% of the total number of delegates registered in attendance at the Convention.

10. Convention Rules:

Conventions of the Party shall be conducted in accordance with the current Bylaws and Convention Rules, unless otherwise amended at a Regular Convention.

ARTICLE 13: PRESIDENTIAL AND VICE-PRESIDENTIAL CAMPAIGNS

1. Nominations of candidates for President and Vice-President of the United States may be made only at the Regular Convention immediately preceding a Presidential election.

2. No candidate may be nominated for President or Vice-President who is ineligible under the United States Constitution, who has not expressed a willingness to accept the nomination of the Party, or who is not a member of the Party.

3. In the event of the death, resignation, disqualification or suspension of the nomination of the Party's nominee for President, the Vice-Presidential nominee shall become the Presidential nominee. Two-thirds of the entire membership of the National Committee may, at a meeting, fill a Vice-Presidential vacancy, and, if necessary, a simultaneous Presidential vacancy.

4. The National Committee shall respect the vote of the delegates at Nominating Conventions and provide full support for all nominees for President and Vice-President as long as their campaigns are conducted in accordance with the Platform of the Party.

5. A candidate's nomination may be suspended by a 3/4 vote of the entire membership of the National Committee at a meeting. That candidate's nomination shall then be declared null and void unless the suspended candidate appeals the suspension to the Judicial Committee within seven days of receipt of notification of suspension. The resolution of suspension must state the specific reasons for suspension and must be signed by each member of the National Committee agreeing thereto. The Judicial Committee shall meet and act on this appeal within 30 days and before the election.

ARTICLE 14: PARLIAMENTARY AUTHORITY

The rules contained in the current edition of Robert's Rules of Order, Newly Revised shall govern the Party in all cases to which they are applicable and in which they are not inconsistent with other rules adopted by the Party.

ARTICLE 15: AMENDMENT

1. These Bylaws may be amended by a 2/3 vote of the delegates at any Regular Convention.

2. Article 4, Section 1, shall not be amended by a vote of less than 7/8 of all registered delegates at a Regular Convention.

ARTICLE 16: PROMULGATION OF BYLAWS

The National Committee shall promulgate the Bylaws in accordance with applicable law. A copy of these Bylaws and Convention Rules shall be provided to each member of the National Committee, each member of the Judicial Committee and each Chair of an affiliate party within 90 days of adoption.

CONVENTION RULES OF THE LIBERTARIAN PARTY

RULE 1: ORDER OF BUSINESS

The standing order of business for a Regular Convention shall be as follows:

1. Call to order
2. Credentials Committee report
3. Adoption of agenda
4. Treasurer's report
5. Bylaws and Rules Committee report (Non-nominating conventions only)
6. Platform Committee report (At non-Presidential nominating conventions only deletions may be considered.)
7. Nomination of Party candidates for President and Vice-President (in appropriate years)
8. Election of Party Officers and at-large members of the National Committee
9. Election of Judicial Committee
10. Resolutions
11. Other business

RULE 2: VOTING ELIGIBILITY

1. The Secretary, acting on behalf of the Credentials Committee, shall report the number of delegates registered in attendance and eligible to vote directly after the opening of the first business session, and at the beginning of each succeeding session.

2. All delegates shall be eligible to vote on all matters. In order to vote on a given matter, a delegate must be present on the floor at the time the vote is taken. Each delegate present shall have one vote. Use of the unit rule or unit voting is prohibited at national conventions.

3. Duly selected alternates may be freely substituted for any members of their delegation, except for ex-officio delegates, who are temporarily or permanently absent from the floor, provided the procedure has been clearly specified by the affiliate party in advance of the Convention, and the Secretary has been provided with lists of the affiliate party's delegates and alternates as well as a copy of the affiliate party's rules governing substitutions.

4. An alternate, upon certification by the Secretary, may function as a delegate whenever a delegate of the same state has not been registered in attendance. This status shall continue until the absent delegate registers in attendance. If the affiliate party has made no provision for filling delegate vacancies, the alternate substitute shall be decided by drawing lots.

5. If the affiliate party has made no other provision, an alternate may temporarily vote in place of a delegate from the same state while he or she has the written consent of that delegate; however, no delegate may cast more than one vote on a question.

6. All members must wear the identification badge issued upon registration in order to be admitted to the Convention hall.

RULE 3: VOTING PROCEDURE AND MOTIONS

1. On all matters, except the election of Party Officers and at-large members of the National Committee, and the nomination of Presidential and Vice-Presidential candidates, voting will be by voice vote. If ten or more delegates object to the Chair's ruling on the outcome of a voice vote, a counted vote will be held.

2. The Chair may require any motion offered from the Convention floor to be in writing, signed by the mover and submitted to the Secretary.

RULE 4: POLLING PROCEDURE

1. The State Chair shall serve as chair of his or her delegation, unless that delegation selects another of its members to serve as its chair and so notifies the Secretary.

2. In cases where a roll call vote is required, polling shall be by state. The Secretary will ask for the vote from each state in alphabetical order, and the chair of each delegation shall report the vote for that state. The Convention meeting will be by state delegation. If someone challenges the vote reported by any state's chair, the Secretary shall poll the delegates from that state individually.

RULE 5: COMMITTEE PROCEDURES

1. A majority vote of those Committee members present is necessary for a "do pass" recommendation, and in the case of the Platform Committee, a majority must approve each specific plank separately.

2. Four or more members of the Platform Committee may join together to issue a minority report regarding any plank reported to the floor of the Convention. Two or more members of the Bylaws and Rules Committee or of the Credentials Committee may join together to issue a minority report regarding their business.

3. A member must be present in Committee to vote.

4. More than 1/2 of the membership of each committee shall constitute a quorum.

RULE 6: DEBATING AND VOTING -- BYLAWS AND RULES

The Chair of the Bylaws and Rules Committee shall report each recommendation of the Committee to the Convention separately and may explain the intent or purpose of the proposed amendment(s). The Convention Chair shall open each recommendation to discussion and amendment from the floor. Each recommendation shall be considered and adopted separately, with a maximum of ten minutes discussion on any recommendation.

RULE 7: DEBATING AND VOTING -- PLATFORM

1. The current Platform shall serve as the basis of all future platforms. At Regular Conventions, the existing Platform may be amended. Additional planks, or additions to planks, must be approved

by 2/3 vote. A platform plank may be deleted by majority vote.

2. The Platform Committee shall meet before each Regular Convention and prepare a report containing its recommendations. At the convention, the Platform Committee's recommendations shall be reported to the floor and debated and voted upon separately. The Platform Committee shall set forth the order in which each recommendation shall be considered.

3. Recommendations for which there is no minority report shall be debated and voted upon in the following manner:

a. The Platform Committee Chair, or some other person designated by him or her, shall read the proposed recommendation and shall have up to two minutes to explain the recommendation.

b. The Convention Chair shall then open the recommendation to discussion and amendment for a period of 15 minutes. At the end of 15 minutes, a vote will be taken on whether to bring the recommendation (as amended, if this is the case) to a final vote. If a majority vote is in favor of immediate consideration, the vote to accept or reject the recommendation must follow immediately. If a majority vote is against immediate consideration, the proposed recommendation shall be tabled for later consideration after all other recommendations receiving a favorable majority vote from the Platform Committee have been considered.

4. Recommendations for which there is a minority report shall be debated and voted upon in the following manner:

a. Spokespersons for both the majority and minority positions shall each have two minutes to present their views.

b. The Chair shall then open consideration of both positions for five minutes during which time any delegates may express their views without offering amendments. After five minutes, there will be a vote on which of the two reports shall be considered for purposes of adopting a recommendation. The report receiving the greater number of votes shall then be discussed and voted upon in the manner described in Section 3b.

5. After all Committee recommendations have received initial consideration, any delegate may propose amendments to the Platform. The delegate may take up to two minutes to state and explain the proposal, with debating and voting to proceed as described in Section 3b.

6. Finally, if time permits, proposals which were considered by the Platform Committee but which received an unfavorable vote from a majority of the Committee, may be considered, with a spokesperson for the minority position giving the reasons in favor and the Platform Committee Chair or other representative of the majority position giving the reasons why it was voted down, before the proposal is taken to the floor for debate.

7. Challenges of adopted Party planks believed by 10% of the delegates to be in conflict with the Statement of Principles shall be referred in writing, during the Convention, to the Judicial Committee by the delegates requesting action for consideration. The challenge shall specify in what manner the plank is believed to be in conflict. The Judicial Committee shall consider the challenge, decide whether the Statement of Principles is conformed to and report their findings and reasons to the Convention. If the plank is vetoed by the Judicial Committee, it will be declared null and void but can be reinstated by a 3/4 vote of the Convention.

RULE 8: RESOLUTIONS

1. Resolutions must be approved by a 2/3 vote.

2. Resolutions must not be in conflict with the Statement of Principles. Challenges of such adopted Resolutions believed by 10% of the delegates to be in conflict with the Statement of Principles shall be referred in writing, during the Convention, to the Judicial Committee by the delegates requesting action for consideration. The challenge shall specify in what manner the Resolution is believed to be in conflict. The Judicial Committee shall consider the challenge, decide whether the Statement of Principles is conformed to, and report their findings and reasons to the Convention. If the Resolution is vetoed by the Judicial Committee, it will be declared null and void but can be reinstated by a 3/4 vote of the Convention.

RULE 9: NOMINATION OF PRESIDENTIAL AND VICE-PRESIDENTIAL CANDIDATES

1. Presidential and Vice-Presidential nominations shall be from the floor. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all the delegations have submitted their votes, the Secretary shall declare the voting closed. At this point, an announcement of each delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

2. The Party's nominee for President shall be chosen by majority vote. If, after two ballots, no candidate has attained a majority, the candidate with the fewest votes on the latest ballot shall be struck from subsequent ballots. This procedure shall be repeated after every subsequent ballot in which no candidate has received a majority vote, until one candidate attains a majority.

3. The Party's nominee for Vice-President shall be chosen by the same procedure as for the Presidential nominee except that the Presidential nominee shall have the privilege of addressing the Convention for 5 minutes, after nominations have been made but before voting has begun, for the purpose of endorsing or objecting to any of the Vice-Presidential nominees.

4. Nominating and seconding speeches shall be limited in duration as follows:

President: Total of 16 minutes:

Vice-President: Total of 11 minutes.

RULE 10: ELECTION OF OFFICERS AND NATIONAL COMMITTEE

1. Nominations for Party Officers shall be from the floor, with any national or affiliate party member eligible to run for any office. The election shall be conducted in the following manner:

a. For each office, a majority vote will be necessary for election.

b. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all delegations have submitted their votes, the Secretary shall declare the voting closed.

c. At this point, an announcement of each delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

d. In cases where no candidate receives a majority, runoff votes will be held, dropping the candidate with the fewest votes after each ballot.

2. Nominations for the at-large members of the National Committee shall be from the floor, with all national or affiliate party members eligible for nomination. The election shall be conducted in the following manner:

a. Each delegate may cast up to five votes, but no more than one vote for any one candidate.

b. Each delegation shall tabulate its total vote, and the delegation chair shall deliver a written total to the Secretary. When all delegations have submitted their votes, the Secretary shall declare the voting closed.

c. At this point, an announcement of each delegation's vote total shall be made by delegation chairs in alphabetical order beginning with a randomly selected delegation.

d. Those five candidates receiving the highest vote totals shall be declared elected. If a tie vote affecting the outcome of the election occurs, another ballot for the remaining offices shall be held with each delegate allowed to cast as many votes as there are offices to fill.

3. Nominations and elections for members of the Judicial Committee shall be conducted in the same manner as specified for at-large members of the National Committee.

4. Nominations for each candidate may be made by any delegate present on the floor, provided he or she has the candidate's permission. Nominating speeches shall be limited in duration as follows:

a. Chair: one five-minute nominating speech, two three-minute seconding speeches;

b. All others: one two-minute nominating speech, two one-minute seconding speeches.

5. In the event a region has not otherwise provided for the election of its regional representative to the National Committee then the delegates from the region shall elect its regional representative, provided there are at least five delegates present. Each Region's delegates may elect their representative in whatever manner they choose, provided all delegates present from that region are given equal voice in the selection.

RULE 11: NONE OF THE ABOVE

Votes cast for "None of the Above" in voting on the Party's nominees for President and Vice-President, the Party Officers, and at-large members of the National Committee, shall be considered valid. Should a majority of the votes be cast for "None of the Above" in the Presidential or Vice-Presidential balloting, no candidate shall be nominated for that office. Should "None of the Above" be selected for any Party office, that position shall be declared vacant and none of the losing candidates for that position may be selected to fill the vacancy for that term of office.

RULE 12: AMENDMENTS TO THE RULES

The Convention Rules may be amended by a 2/3 vote at a Regular Convention.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3177.

12/7/92

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COMMISSION
MAIN COPY ROOM
Nov 17 11 05 AM '92

12 November 1992
3933 S. 326th Place
Auburn, WA 98001-9639

Mary Taksar
FEDERAL ELECTION COMMISSION
Office of General Counsel
999 E. Street N.W.
Washington, DC 20463

CLOSED

In Re: MUR 3177

Dear Ms. Taksar,

On 30 June 1992, you wrote to inform me that the Federal Election Commission had decided to take no further action regarding MUR 3177. On 7 July, I responded to your letter with an argument that your inaction in this case was ill-founded, and also with various questions concerning the implications and precedents to be set by this decision. As of this date, you have not responded to my letter of 7 July.

I understand that, as a participant or respondent in MUR 3177, I am eligible to request a copy of all correspondence submitted to the FEC by all respondents in this case. I therefore request such copies of correspondence, subject to whatever fee you may require for the cost of copying and postage.

Yours truly,

Michael J. Dunn

Michael J. Dunn
(206) 838-5820 (home)
(206) 773-5581 (work)

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WASHINGTON, D.C. 20463

✓ Microfilm

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THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3177.

1/7/93

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1992

Mr. Michael Dunn
3933 S. 326th Place
Auburn, WA 98001-9639

RE: MUR 3177

Dear Mr. Dunn:

On June 30, 1992, you were informed that, after conducting an investigation in this matter, the Commission decided on June 2, 1992 to exercise its prosecutorial discretion and take no further action in this matter. Accordingly, the Commission closed the file in this matter on June 2, 1992.

In response to the Commission's letter notifying you that the file had been closed, you submitted a letter dated July 7, 1992. A copy of your July 7, 1992, letter was placed on the public record in reference to MUR 3177. As the Commission has decided to close the file in this matter, this is the only action that will be taken in regard to your letter.

Your request for a copy of the documents in MUR 3177 has been forwarded to the Public Records Division. This is the Division from which you may request copies of documents in MUR 3177. You may want to contact Public Records directly regarding your request. The telephone number for Public Records is (202) 219-4140.

Sincerely,

Lois G. Lerner
Associate General Counsel

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