



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4258

DATE FILMED 4-16-97 CAMERA NO. 1

CAMERAMAN Jim H

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BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 19 12 10 PM '95

SEP 15 2 14 PM '95

THE CENTER FOR RESPONSIVE POLITICS,)

1320 19th Street, NW)

Suite 700)

Washington, D.C. 20036)

(202) 857-0044)

Complainant,)

v.)

National Republican Senatorial)

Committee, Oregon Republican)

Party)

Respondents.)

MUR 4258

COMPLAINT

SENSITIVE

COMPLAINT OF THE CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that respondents National Republican Senatorial Committee ("NRSC") and the Oregon Republican Party violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA" or the "Act"), by making coordinated expenditures in excess of the limits provided by the FECA.

PARTIES

2. Complainant Center for Responsive Politics ("Center") is a nonprofit, nonpartisan research organization incorporated in the State of Iowa and headquartered in Washington, D.C. that studies the role that money plays in Federal elections. Founded in 1983, the Center was designed to study Congress and examine potential reforms that could improve both its internal operation and its responsiveness to the American public.

3. Respondent NRSC is a national political committee that has made expenditures to or on behalf of Senator Robert Packwood or the Re-elect Packwood Campaign Committee.

4. Respondent Oregon Republican Party is a State political committee

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that has made expenditures to or on behalf of Senator Robert Packwood or the Re-elect Packwood Campaign Committee.

APPLICABLE STATUTES AND REGULATIONS

5. The FECA provides that,

notwithstanding any other provision of law with respect to limitations on expenditures or limitations on contributions, the national committee of a political party and a State committee of a political party...may make expenditures in connection with the general election campaign of candidates for Federal office, subject to the limitations contained in paragraphs (2) and (3) of § 441a(d) of the FECA. 2 U.S.C. § 441a(d)(1); 11 C.F.R. 110.7.

6. Any coordinated expenditure in connection with the general election campaign of a candidate for Federal office made by the national or state committee of a political party may not exceed, in the case of a candidate for election to the office of Senator, 2 cents multiplied by the voting age population of the State plus a cost of living adjustment. State party committees may transfer their limits to the national committees. 2 U.S.C. § 441(a)(d)(3); 11 C.F.R. 110.7.

GROUND'S FOR COMPLAINT

7. Attached as Exhibit 1 is a Federal Election Commission Press Release, dated February 28, 1992, and corrected March 6, 1992, which shows that the national and state political party could each spend up to \$120,091.76 in Oregon in the 1992 Senate election, for a total of coordinated expenditures not to exceed \$240,183.52.

8. Attached as Exhibit 2 is the Report of Receipts and Disbursements for Other Than an Authorized Committee, submitted by the NRSC on the twelfth day preceding the General Election, on file in the FEC as of September 12, 1995. Exhibit 2 shows that from October 1 to October 14, 1992, the NRSC made the following coordinated expenditures on behalf of Bob Packwood:

October 9, 1992	\$29,986.70
October 6, 1992	\$37.50
October 6, 1992	\$37.50
October 6, 1992	\$75.00
October 8, 1992	\$14,925.00
October 12, 1992	\$26,937.00

Total coordinated expenditures by the NRSC for the reporting period were \$71,998.70.

9. Attached as Exhibit 3 is the Report of Receipts and Disbursements for Other Than an Authorized Committee, submitted by the NRSC on the thirtieth day following the General Election, on file at the FEC as of September 12, 1995. Exhibit 3 shows that from October 15 to November 23, 1992, the NRSC made the following coordinated expenditures on behalf of Bob Packwood:

October 27, 1992	\$57,256.32
October 15, 1992	\$47,200.37
October 15, 1992	\$3,774.99
October 15, 1992	\$669.16
October 22, 1992	\$150.00
October 26, 1992	\$30,067.50
October 30, 1992	(\$2,650.00)
November 2, 1992	\$29,000.00
November 11, 1992	\$2,716.00

Total coordinated expenditures by the NRSC for the reporting period were \$168,184.34.

11. Upon information and belief, total coordinated expenditures by the NRSC on behalf of the Bob Packwood for the entire period of October 1 through November 23, 1992 were \$240,183.04.

12. Attached as Exhibit 4 is the amended April 15 Quarterly Report of Receipts and Disbursements for Other Than an Authorized Committee, submitted by the Oregon Republican Party, on file at the FEC as of September 12, 1995. Exhibit 4 shows that the Oregon Republican Party made the

following coordinated expenditures on behalf of Bob Packwood in the state of Oregon:

March 25, 1992	\$3,841.43
March 27, 1992	\$1,500.00
March 27, 1992	\$1,500.00
March 27, 1992	\$1,500.00
March 27, 1992	\$1,500.00
March 27, 1992	\$150.00
March 27, 1992	\$292.80

Total coordinated expenditures by the Oregon Republican Party for the reporting period were \$10,284.23.

13. Attached as Exhibit 5 is the amended July 15 Quarterly Report of Receipts and Disbursements for Other Than an Authorized Committee, submitted by the Oregon Republican Party, on file at the FEC as of September 12, 1995. Exhibit 5 shows that the Oregon Republican Party made the following coordinated expenditures on behalf of Bob Packwood in the state of Oregon:

May 7, 1992	\$1,550.00
May 11, 1992	\$41,784.00

Total coordinated expenditures by the Oregon Republican Party for the reporting period were \$43,334.00.

14. Attached as Exhibit 6 is the amended January 31 Year End Report of Receipts and Disbursements for Other Than an Authorized Committee, submitted by the Oregon Republican Party, on file at the FEC as of September 12, 1995. Exhibit 6 shows that the Oregon Republican Party made the following coordinated expenditures on behalf of Bob Packwood in the state of Oregon:

December 31, 1992	\$1,673.34
-------------------	------------

Total coordinated expenditures by the Oregon Republican Party for the

reporting period were \$1,673.34.

15. Upon information and belief, total coordinated expenditures by the Oregon Republican Party on behalf of Bob Packwood for the entire period of January 1, 1992 through December 31, 1992 were \$55,291.57.

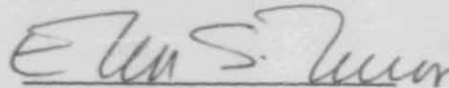
16. Upon information and belief, coordinated expenditures made by the NRSC and the Oregon Republican Party on behalf of Bob Packwood totaled \$295,474.61.

17. Upon information and belief, total coordinated expenditures made by the NRSC and the Oregon Republican Party in 1992 on behalf of Bob Packwood exceeded the applicable coordinated expenditure limit by \$55,291.09, in violation of FECA.

RELIEF

15. The Center respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondents have violated the FECA and Commission regulations, and to impose penalties for each violation. Finally, the Center urges the Commission to investigate whether the violations described above were knowing and willful so as to mandate enhanced penalties.

Respectfully submitted,



Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, NW
Washington, D.C. 20036
(202) 857-0044

Dated: September 15, 1995

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VERIFICATION

The undersigned complainant, on behalf of the Center for Responsive Politics, swears that the statements in this Complaint are based on the sources indicated, and, as such, are true and correct to the best of her information and belief.

Ellen S. Miller

Ellen S. Miller

District of Columbia)

) ss

Subscribed and sworn to before
me this 15th day of September, 1995

Natalie R. Arosemena

Notary Public

NATALIE R. AROSEMENA
NOTARY PUBLIC
My Commission Expires April 15, 1996



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Exhibit 1

Federal Election Commission Press Release

97043791009

FEDERAL ELECTION COMMISSION



Press Office

999 E Street, N.W., Washington, D.C. 20463

Phone: Local 202-219-4155

Toll Free 800-424-9530

FOR IMMEDIATE RELEASE
FEBRUARY 28, 1992
[CORRECTED MARCH 6, 1992]

CONTACT: FRED EILAND
SHARON SNYDER
SCOTT MOXLEY

FEC ANNOUNCES 1992 PARTY SPENDING LIMITS —AMOUNTS RANGE FROM \$110,480 TO \$2.5 MILLION—

WASHINGTON -- The Federal Election Commission today announced the 1992 general election spending limits for national and state political party committees.

Amounts for Senate campaigns will range from a low of \$110,480 in Alaska, to a high of \$2,454,644.64 for each of the California Senate races.

These general election expenditures, known as "coordinated expenditures", are limited under the election law. The national committees of each political party have a set amount they may spend on behalf of each U.S. House and Senate candidate. State party committees may spend equal amounts or may transfer their limits to the national committees, effectively doubling the national committees' expenditure limits in those states or districts.

Coordinated expenditures are made in addition to direct contributions. They are allowed only with regard to the general election, and do not count as either contributions to candidates or as expenditures made by candidates. Party committees may work with candidates' campaigns to determine how the money should be spent, but the campaigns do not receive the funds, the expenditures are reported directly by the party committees on special schedules on their financial disclosure reports.

CORRECTED PARAGRAPH--

The election law sets the limit for House races at \$10,000, plus a cost-of-living adjustment (COLA). For 1992, that limit is \$27,620, except in states with only one congressional district, where the limit will be \$55,240.

The limits for Senate races are based on state voting age populations (VAP), with a base limit for states with smaller populations. The formula for determining a state's limit is:

$\$.02 \times \text{State VAP} + \text{Cost-of-Living}$

-or-

$\$20,000 + \text{Cost-of-Living}$

-whichever is greater

The following page lists party expenditure limits for each state.

-more-

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State	VAP (in thousands)	1992 Limit
Alabama	3,018	\$ 166,714.32
*Alaska	391	55,240.00
Arizona	2,740	151,357.60
Arkansas	1,746	96,449.04
California	22,218	1,227,322.32
Colorado	2,493	137,713.32
Connecticut	2,527	139,591.48
*Delaware	512	55,240.00
Florida	10,280	567,867.20
Georgia	4,848	267,803.52
Hawaii	846	55,240.00
Idaho	721	55,240.00
Illinois	8,545	472,025.80
Indiana	4,144	228,914.56
Iowa	2,069	114,291.56
Kansas	1,822	100,647.28
Kentucky	2,754	152,130.96
Louisiana	3,018	166,714.32
Maine	924	55,240.00
Maryland	3,659	202,123.16
Massachusetts	4,622	255,319.28
Michigan	6,884	380,272.16
Minnesota	3,243	179,143.32
Mississippi	1,841	101,696.84
Missouri	3,818	210,906.32
Montana	585	55,240.00
Nebraska	1,158	63,967.92
Nevada	962	55,240.00
New Hampshire	824	55,240.00
New Jersey	5,919	326,965.56
New Mexico	1,089	60,156.36
New York	13,691	756,290.84
North Carolina	5,094	281,392.56
*North Dakota	461	55,240.00
Ohio	8,120	448,548.80
Oklahoma	2,330	128,709.20
*Oregon	2,174	120,091.76
Pennsylvania	9,132	504,451.68
Rhode Island	774	55,240.00
South Carolina	2,622	144,839.28
*South Dakota	503	55,240.00
Tennessee	3,723	205,658.52
Texas	12,380	683,871.20
Utah	1,128	62,310.72
*Vermont	422	55,240.00
Virginia	4,748	262,279.52
Washington	3,703	204,553.72
West Virginia	1,364	75,347.36
Wisconsin	3,644	201,294.56
*Wyoming	323	55,240.00

*In these states, the Senate limit also applies to the House nominee.

Exhibit 2

NRSC Report of Receipts and Disbursements for
Other Than an Authorized Committee

Twelfth day preceding the General Election

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Summary Page

1. NAME OF COMMITTEE (NAME) NATIONAL REPUBLICAN SENATORIAL COMMITTEE		SECRETARY OF THE SENATE OFFICE OF THE CLERK U.S. SENATE WASHINGTON, DC 20540
ADDRESS (Number and Street) ☐ Check if address has previously reported 425 SECOND STREET, N.E. CITY, STATE and ZIP CODE WASHINGTON, DC 20002		2. NO. OF CANDIDATES 00000000
		3. The committee qualified as a multicandidate committee during this reporting period on ☐ Yes ☒ No

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
 February 28 June 28 October 28
 March 28 July 28 November 28
 April 28 August 28 December 28
 May 28 September 28 January 31

☒ Twelfth day report preceding GENERAL
 (Type of Election)
 election on 11/03/92 in the State of _____

☐ Thirtieth day report following the General Election on _____
 in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

9204370001

SUMMARY		COLUMN A Total Received	COLUMN B Total Disbursed
1. Covering Period	10/01/92 through 10/14/92		
2. (a) Cash on Hand January 1, 1992			\$ (671,902.05)
2. (b) Cash on Hand at Beginning of Reporting Period		\$ 1,790,841.48	
3. (a) Total Receipts (from Line 1B)		\$ 4,008,228.12	\$ 41,228,214.16
3. (b) Subtotal (add Lines 6(a) and 6(b) for Column A and Lines 6(a) and 6(b) for Column B)		\$ 5,799,069.60	\$ 40,556,311.01
7. Total Disbursements (from Line 3B)		\$ 5,725,599.26	\$ 40,512,840.47
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(b))		\$ 43,470.54	\$ 43,470.54
9. Debt and Obligations Owed TO the Committee (transfer all on Schedule C and/or Schedule D)		\$ 49,420.33	
10. Debt and Obligations Owed BY the Committee (transfer all on Schedule C and/or Schedule D)		\$ 2,331,495.21	

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

Type or Print Name of Treasurer

JAMES L. HAGEN

Signature of Treasurer

James L. Hagen

Date

11/22/92

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

PEC FORM 31

Revised 11/91

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES PAGE 01 Page 6 OF 15
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS) Line Number 25
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 6441(c))

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If yes, name the designating committee: ☐ NO			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE	Date	Amount
	(SUPPORTED, STATE, DISTRICT)	(month, day, yr)	
	(and Office sought)		
MULTI MEDIA SERVICES CORP. 1001 N. FAIRFAX STREET ALEXANDRIA VA 22314	RICH WILLIAMSON U.S. SENATE ILLINOIS	11/09/92	15000.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		552488.72
THE POSTMASTER PHOENIX AZ 85026	JOHN MCCAIN U.S. SENATE ARIZONA	11/09/92	75.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		5181939.76
SOUTHWEST PUBLISHING INC 1600 NW TOPEKA BLVD TOPEKA KS 66617	BOB PACKWOOD U.S. SENATE ID-BOON	11/09/92	2955.70
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		571998.70
THE POSTMASTER PHOENIX AZ 85026	JOHN MCCAIN U.S. SENATE ARIZONA	11/09/92	31500.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		5181939.76
TOTAL OF EXPENDITURES THIS PAGE (continued)			211,961.71
TOTAL THIS PERIOD (last page this line number only)			

**SCHEDULE F - EXPENSES COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 6441a(d))**

Page 3 of 13
Line Number 15

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES

Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee ()
NO

Full Name, Mailing Address and Zip Code of Subordinate Committee

FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE (SUPPORTED, STATE, DISTRICT and Office sought)	Date (month, day, yr)	Amount
---	--	--------------------------	--------

THE POSTMASTER ICPEKA KS 66603	BOB PACKWOOD U.S. SENATE ICRECON	10/06/92	37.50
PURPOSE OF EXPENDITURE MAIL PERMIT	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	871998.70	

THE POSTMASTER ICPEKA KS 66603	BOB NICKLES U.S. SENATE ICALEMONE	10/06/92	37.50
PURPOSE OF EXPENDITURE POSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	840065.95	

THE POSTMASTER ICPEKA KS 66603	BOB PACKWOOD U.S. SENATE ICRECON	10/06/92	37.50
PURPOSE OF EXPENDITURE POSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	871998.70	

THE POSTMASTER ICPAWA NE 68102	BOB NICKLES U.S. SENATE ICALEMONE	10/06/92	75.00
PURPOSE OF EXPENDITURE MAIL PERMIT	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	840065.95	

SUBTOTAL OF EXPENDITURES THIS PAGE (COPIED) 1 147.50

TOTAL THIS PERIOD (LAST COPY THIS LINE NUMBER ONLY) 1

97043391015

**SCHEDULE B - EXPENSES COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 6448c(d))**

Page 9 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES

Has your Committee been designated to make coordinated expenditures by a
political party committee? If so, name the designating committee(s) []
[]

Full Name, Mailing Address and Zip Code of Subordinate Committee

FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT and Office sought	Date (month, day, yr)	Amount
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THE POSTMASTER 157 CPANA NE 68102	BOB PACKARD U.S. SENATE ARIZONA	11/08/92	75.00
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PURPOSE OF EXPENDITURE MAIL PERMIT	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	971998.70
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THE JANUARY GROUP 2025 NORTH THIRD STREET DENVER CO 80202	JOHN MCCAIN U.S. SENATE ARIZONA	11/08/92	21545.00
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PURPOSE OF EXPENDITURE MAILING	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8181939.76
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KARL ROVE & COMPANY P.O. BOX 1902 ALSTON TX 75707	JOHN MCCAIN U.S. SENATE ARIZONA	11/08/92	25000.00
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PURPOSE OF EXPENDITURE MAIL PERMIT	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	9115809.77
---------------------------------------	---	------------

MARKET STRATEGIES 1000 TOWN CENTER SOUTHFIELD MI 48075	JOHN MCCAIN U.S. SENATE ARIZONA	11/08/92	7500.00
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PURPOSE OF EXPENDITURE SURVEY RESEARCH	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	9115809.77
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TOTAL OF EXPENDITURES THIS PERIOD

TOTAL THIS PERIOD

97043791016

**SCHEDULE P - ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 6411(c))**

Page 20 of 25
LSP# Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee () ()			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
PULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE	Date	Amount
	SUPPORTED, STATE, DISTRICT	(month, day, yr)	
	and Office sought		
RSM, INC. 344 LANHAM-SEVERN ROAD LANHAM MD 20706	CHARLES WALKER U.S. SENATE SOUTH CAROLINA	11/08/92	10850.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
MEDIA SERVICE	FOR CANDIDATE -	8110480.00	
SPITH & HARRISON, INC. 71 CANAL CENTER PLAZA ALEXANDRIA VA 22314	JOHN MCCAIN U.S. SENATE ARIZONA	11/08/92	3392.50
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
MAIL PRODUCTION	FOR CANDIDATE -	8181939.76	
SOUTHWEST PUBLISHING AND 2600 N. TUCUPEA BLVD TUCUPEA AZ 85707	JOHN MCCAIN U.S. SENATE ARIZONA	11/08/92	14925.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
MAIL PERMIT	FOR CANDIDATE -	871998.70	
THE JANUARY GROUP 1205 NORTH THIRD STREET PHOENIX AZ 85004	JOHN MCCAIN U.S. SENATE ARIZONA	11/12/92	3670.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	8181939.76	
SUBTOTAL OF EXPENDITURES THIS PERIOD			188,707.00
TOTAL THIS PERIOD (LAST DATE THIS PERIOD ENDS)			

97043791037

**SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 441b(d))**

Page 18 of 19
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Was your Committee ever designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: ☐ YES ☐ NO			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE (SUPPORTED, STATE, DISTRICT, and Office sought)	Date (month, day, year)	Amount
MCNEIL GRIFFIN & ASSOC. INC. 924 COMMERCIAL STREET MANCHESTER NH 02101	JOHN GREGG U.S. SENATE NEW HAMPSHIRE	11/12/92	10516.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
MEDIA SERVICE	FOR CANDIDATE -	0110400.00	
ARIZONA REPUBLICAN PARTY 1801 NORTH 24TH STREET PHOENIX AZ 85016	JOHN MCCAIN U.S. SENATE ARIZONA	11/12/92	3482.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	0101939.76	
SOUTHWEST PUBLISHING AND 2600 NW TOPERA BLVD PEORIA AZ 85107	JOHN MCCAIN U.S. SENATE ARIZONA	11/12/92	2407.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	071998.70	
B & R PRINTING & MAILING, INC. 12649 N. 31ST AVENUE PHOENIX AZ 85117	JOHN MCCAIN U.S. SENATE ARIZONA	11/13/92	555.00
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	0101939.76	
TOTAL OF EXPENDITURES THIS MONTH			
TOTAL THIS MONTH			

27043791038

Exhibit 3

NRSC Report of Receipts and Disbursements for
Other Than an Authorized Committee

Thirtieth Day Report

97043791039

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAG AND LABEL
ON OR PRINT
TYPE OR PRINT

1. NAME OF COMMITTEE OR CANDIDATE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE
ADDRESS (number and street) Check if different than previously reported
425 SECOND STREET, N.E.
CITY, STATE and ZIP CODE
WASHINGTON, DC 20002

2. SECRETARY OF THE SENATE

3. FEC IDENTIFICATION NUMBER
000027466
This committee qualified as a multicandidate committee during this reporting period on _____

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
July 15 Quarterly Report
October 15 Quarterly Report
January 31 Year End Report
July 31 Mid Year Report (Non-election Year Only)

Monthly Report Due On
February 28 June 30 October 30
March 30 July 30 November 30
April 30 August 30 December 30
May 30 September 30 January 31

Twelfth day report preceding _____
Type of Election
election of _____ in the State of _____

X Thirtieth day report following the General Election of
11-03-92 in the State of _____

Termination Report

(b) Is this Report an Amendment? YES ☒ NO ☐

SUMMARY

1. Covering Period 10-15-92 through 11-23-92

2. (a) Cash on Hand January 1, 1992

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	\$ (671,903.05)

3. (b) Cash on Hand at Beginning of Reporting Period

\$ 43,470.54

4. (c) Total Receipts (from Line 18)

\$ 6,361,635.09 \$ 47,589,849.15

5. (d) Subtotal (add Lines 3(b) and 4(c) for Column A and Lines 3(a) and 5(d) for Column B)

\$ 6,405,105.63 \$ 46,917,946.10

6. Total Disbursements (from Line 20)

\$ 5,930,291.04 \$ 46,443,131.51

7. Cash on Hand at Close of Reporting Period (subtract Line 6 from Line 5(d))

\$ 474,814.59 \$ 474,814.59

8. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)

\$ 49,420.73

9. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)

\$ 3,836,942.88

For further information contact
Federal Election Commission
888 E Street, NE
Washington, DC 20543
Tel: Free 800-424-9530
Local 202-576-9200

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

Type or Print Name of Treasurer

JAMES L. RAGER

Signature of Treasurer

James L. Rager

Date

12-03-92

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 1971.

FEC FORM 3X

(Revised 11-1-91)

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 14-11(d))

Page 3 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: []			
[] NC			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE	Date	Amount
	SUPPORTED, STATE, DISTRICT	(month, day, yr)	
	and Office sought		
WILSON COMMUNICATION SERVICES 407 N. WASHINGTON STREET ALEXANDRIA VA 22314	JACK DALRYMPLE U.S. SENATE NORTH CAROTA	11/19/92	20000.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		9110480.00
MEDIA SOLUTIONS 422 BROADLAND ROAD NW ATLANTA GA 30342	PAUL COVERDELL U.S. SENATE GEORGIA	11/27/92	72247.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		9535607.00
LEARN PUBLISHING COMPANY 1410 NW JOHNSON STREET PORTLAND OR 97209	BOB PACKWOOD U.S. SENATE OREGON	11/27/92	97256.32
PURPOSE OF EXPENDITURE PRINTING SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		9240183.04
MISSOURI PRESS SERVICE 18TH & LOCUST COLUMBIA MO 65201	KIT BOAC U.S. SENATE MISSOURI	11/30/92	15006.54
PURPOSE OF EXPENDITURE ADVERTISING SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		9379904.15
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			164,524.86
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES PAGE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 6441a(d))

Page 4 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO []			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE	Date
		SUPPORTED, STATE, DISTRICT	(month, day, yr)
		and Office sought	
			Amount
BARNHART ADVERTISING, MKTING., 255 SHERMAN STREET DENVER CO 80203		TERRY CONSIDINE U.S. SENATE COLORADO	10/30/92 5081.57
PURPOSE OF EXPENDITURE MEDIA SERVICE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE - 8275426.64	
JOHNSON, MEATH, NELSON & 19239 THREE OAKS DRIVE SILVER SPRING MD 20901		JOHN MCCAIN U.S. SENATE ARIZONA	10/20/92 10000.00
PURPOSE OF EXPENDITURE TELEMARKETING		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE - 8302929.76	
CAMPAIGN TEL LTD. 2256 THIRD AVENUE NEW YORK NY 10128		KIT BOND U.S. SENATE MISSOURI	10/23/92 18450.00
PURPOSE OF EXPENDITURE MEDIA SERVICE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE - 8378984.15	
SOUTHWEST PUBLISHING AND 12400 NW TOPKA BLVD TOPEKA KS 66617		BOB PACKWOOD U.S. SENATE OREGON	10/15/92 47200.37
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE - 8240183.84	
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			80,531.94
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 1641a(d))

Page 9 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES				
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO				
Full Name, Mailing Address and Zip Code of Subordinate Committee				
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT (and Office sought)	Date (month, day, yr)	Amount
SOUTHWEST PUBLISHING AND 2600 NW TOPEKA BLVD TOPEKA KS 66617		BOB PACKWOOD U.S. SENATE OREGON	10/15/92	3774.99
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8240183.04
SOUTHWEST PUBLISHING AND 2600 NW TOPEKA BLVD TOPEKA KS 66617		BOB PACKWOOD U.S. SENATE OREGON	10/15/92	469.16
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8240183.04
KARL REVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767		BOB KASTEN U.S. SENATE WISCONSIN	10/16/92	4432.26
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8402589.12
KARL REVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767		BOB KASTEN U.S. SENATE WISCONSIN	10/16/92	30449.06
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8402589.12
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)				39,325.47
TOTAL THIS PERIOD (last page this line number only)				

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 1441a(d))

Page 6 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT and Office sought	Date (month, day, yr) Amount
KARL ROVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767		KIT BOND U.S. SENATE MISSOURI	10/22/92 9959.20
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	9379904.15
THE POSTMASTER F: PHOENIX AZ 85026		JCHM MCCAIN U.S. SENATE ARIZONA	10/22/92 20456.00
PURPOSE OF EXPENDITURE POSTAGE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8302529.76
THE POSTMASTER F: PORTLAND OR 97208		BOB PACKWOOD U.S. SENATE OREGON	10/22/92 150.00
PURPOSE OF EXPENDITURE POSTAGE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8240183.04
ARTHUR J. FINKELSTEIN & ASSOC 16 NORTH ASTOR IRVINGTON NY 10533		ALPENSE D'AMATO U.S. SENATE NEW YORK	10/26/92 4825.00
PURPOSE OF EXPENDITURE SURVEY RESEARCH		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	81512543.00
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			35,390.20
TOTAL THIS PERIOD (last page this line number only)			

9704379104

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY Page 10 of 15
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) Line Number 25
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2 U.S.C. 1441a(d))

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE				
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES				
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: () NO				
Full Name, Mailing Address and Zip Code of Subordinate Committee				
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE	Date	Amount
		SUPPORTED, STATE, DISTRICT	(month, day, yr)	
		and Office sought		
KARL ROVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767		KIT BOND U.S. SENATE MISSOURI	11/26/92	119618.10
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8379904.15
PCORE LITHOGRAPH INC. 4447 NE GLISAN STREET PORTLAND OR 97213		BOB PACKWOOD U.S. SENATE OREGON	11/26/92	30067.50
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		9240183.04
C & R PRINTING & MAILING INC. 12949 NORTH 31ST AVENUE PHOENIX AZ 85017		JOHN MCCAIN U.S. SENATE ARIZONA	11/26/92	1470.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8302529.76
ARIZONA REPUBLICAN PARTY 13501 NORTH 24TH STREET PHOENIX AZ 85016		JOHN MCCAIN U.S. SENATE ARIZONA	11/26/92	3449.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8302529.76
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)				155,004.60
TOTAL THIS PERIOD (last page this line number only)				

97043791015

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 5441e(d))

Page 13 of 15
Line Number 29

(To be used by Political Committee in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO []			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE	Date	Amount
	SUPPORTED, STATE, DISTRICT and Office sought	(month, day, yr)	
PCORE LITHOGRAPH, INC. 4447 NE GLISAN STREET PORTLAND OR 97213	BOB PACKWOOD U.S. SENATE OREGON	10/30/92	2650.00
PURPOSE OF EXPENDITURE REFUND-POSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8240183.04
MEDIA SOLUTIONS 422 BROADLAND ROAD NW ATLANTA GA 30342	PAUL COVERCELL U.S. SENATE GEORGIA	11/20/92	535607.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE SPEC. ELEC. EXPEND. FOR CANDIDATE -		8535607.00
OPTIMA DIRECT, INC. 1000 VERMONT AVENUE NW WASHINGTON DC 20005	BOB PACKWOOD U.S. SENATE OREGON	11/02/92	29000.00
PURPOSE OF EXPENDITURE TELEMARKETING	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8240183.04
PMF, INC. 905 CAPITOL COLRY, NE WASHINGTON DC 20002	BOB PACKWOOD U.S. SENATE OREGON	11/11/92	2716.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		8240183.04
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			564,673.00
TOTAL THIS PERIOD (last page this line number only)			

27443391016

Exhibit 4

NRSC Report of Receipts and Disbursements for
Other Than an Authorized Committee

April 15 Quarterly Report

97043791047

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE PREC MARS AND LABEL
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) OREGON REPUBLICAN PARTY		2. FEC IDENTIFICATION NUMBER C 00153031
ADDRESS (number and street) ☒ Check if different than previously reported 8196 SW HALL BLVD, SUITE 101		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period or (date)
CITY, STATE and ZIP CODE BEAVERTON, OR 97005		

4. TYPE OF REPORT

- (a) ☒ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report
- Monthly Report Due On:
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 21 |
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>01/01/92 through 03/31/92</u>		
6. (a) Cash on Hand January 1, 1992			\$ 52.78
(b) Cash on Hand at Beginning of Reporting Period		\$ 52.78	
(c) Total Receipts (from Line 1b)		\$ 38,191.11	\$ 38,191.11
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 38,243.89	\$ 38,243.89
7. Total Disbursements (from Line 3c)		\$ 34,394.63	\$ 34,394.26
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 3,849.26	\$ 3,849.26
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

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

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20543
Toll Free 800-426-9930
Local 202-219-3420

Type or Print Name of Treasurer CRAIG C. BRENTON	Date 10/22/93
Signature of Treasurer <i>Craig C. Brenton</i>	

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

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FEC FORM 3X
(Revised 5/1991)

AS AMENDED

93038652335

07043791048

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 441a(m))

Rep. 2 of 2
LINE NUMBER 33

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)					
OREGON REPUBLICAN PARTY					
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☒ NO					
If YES, name the designating committee:					
Full Name, Mailing Address and ZIP Code of Subordinate Committee					
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount	
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON U.S. SENATE	MEAD 1 PLACEMENT FOR NEWSPAPER AD.	03-27 -92		
				Aggregate General Election Expenditure for this Candidate - \$	1500.00
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON U.S. SENATE	MEAD 1 PLACEMENT FOR NEWSPAPER AD.	03-27 -92		
				Aggregate General Election Expenditure for this Candidate - \$	1500.00
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON U.S. SENATE	IN-KIND CONTRIBUTION - MEAD 1 PLACEMENT FOR NEWSPAPER AD.	03-27 -92		
				Aggregate General Election Expenditure for this Candidate - \$	292.00
Full Name, Mailing Address and ZIP Code of Each Party					
Aggregate General Election Expenditure for this Candidate - \$					
SUBTOTAL of Expenditures This Page (optional)					1942.00
TOTAL This Period (see page one line number 33)					10284.23

MS HAICAD02

Exhibit 5

Oregon Republican Party Report of Receipts and Disbursements
for Other Than an Authorized Committee

July 15 Quarterly Report

97043791051

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than an Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
WASHINGTON, D.C. 20542

USE FPC ISSUING LABEL
ON
TYPE OFFPRINT

1. NAME OF COMMITTEE (or INDIVIDUAL) OREGON REPUBLICAN PARTY		2. FPC IDENTIFICATION NUMBER C 00153031
ADDRESS (number and street) ☒ Check if different than previously reported 8196 SW HALL BLVD, SUITE 101		3. The committee qualifies as a multicandidate committee DURING THIS Reporting Period ☐ Yes ☒ No
CITY, STATE and ZIP CODE BEAVERTON OR 97005		

4. TYPE OF REPORT

☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 21

☐ Twelfth day report preceding _____ (Type of Session)

session on _____ in the State of _____

☐ Twelfth day report following the General Election on _____ in the State of _____

5. Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period	<u>09/01/92 through 06/30/93</u>		
8. 100 Cash on hand January 1, 19 <u>92</u>			\$ 52.76
8a Cash on hand at Beginning of Reporting Period		\$ 3,849.26	
101 Total Receipts (from Line 10)		\$ 62,456.00	\$ 100,647.11
102 Subtotal (add Lines 8b and 8a for Column A and Lines 8a and 8a for Column B)		\$ 66,305.26	\$ 100,699.89
7. Total Disbursements (from Line 20)		\$ 72,564.32	\$ 106,958.95
9. Cash on hand at Close of Reporting Period (subtract Line 7 from Line 8a)		\$ <6,259.06>	\$ <6,259.06>
10. Debts and Obligations Owed TO the Committee (Reported as on Schedule C and/or Schedule D)		\$	
10b Debts and Obligations Owed BY the Committee (Reported as on Schedule C and/or Schedule D)		\$	

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

Type or Print name of Treasurer

CRAIG C. BRENTON

Signature of Treasurer

[Signature]

Date

10/22/93

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

FEC FORM 3X
REVISED 1/89

AS AMENDED

93030652322

970443391032

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 6101(a))

Page 1 of 1
Last number 1

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full) OREGON REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: YES NO				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97228	BOb PALKWOOD OREGON US SENATE	PRODUCTION AND BROADCAST OF RADIO AD.	05-07 -92	
	Aggregate General Election Expenditure for this Candidate - \$			1550.00
ROBESON COMMUNICATIONS 5201 NE 35TH ST PORTLAND, OR 97211	BOb PALKWOOD OREGON US SENATE	PRODUCTION AND BROADCAST OF RADIO AD.	05-11 -92	
	Aggregate General Election Expenditure for this Candidate - \$			41784.00
	Aggregate General Election Expenditure for this Candidate - \$			
	Aggregate General Election Expenditure for this Candidate - \$			
SUBTOTAL of Expenditures This Page (include)				43374.00
TOTAL This Period (last page this line number only)				43374.00

AS AMENDED

93030652327

97043391053

Exhibit 6

Oregon Republican Party Report of Receipts and Disbursements
for Other Than an Authorized Committee

January 31 Year End Report

97043791054

USE PREVIOUS EDITIONS
TYPE OF REPORT

1. NAME OF COMMITTEE OR CANDIDATE
OREGON REPUBLICAN PARTY
Check if primary with previously reported
2. ADDRESS (Number and Street)
8196 SW HALL BLVD, SUITE 101
3. CITY, STATE AND ZIP CODE
BEAVERTON, OR 97005

4. FEC IDENTIFICATION NUMBER C-00153031
This committee qualified as a multi-candidate committee DURING THIS Reporting Period on

5. TYPE OF REPORT

- ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)

- Monthly Report Due On:**
☐ February 28 ☐ June 30 ☐ October 30
☐ March 31 ☐ July 31 ☐ November 30
☐ April 30 ☐ August 31 ☐ December 31
☐ May 31 ☐ September 30 ☐ January 31

- ☐ Threshold report preceding _____ (Type of Election)
 election on _____ in the State of _____
☐ Threshold report following the General Election on _____ in the State of _____

☐ Termination Report

6. Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>11/20/92</u> through <u>12/31/92</u>		
6.	(a) Cash on Hand January 1, 19 <u>92</u>		\$ 52.78
	(b) Cash on Hand at Beginning of Reporting Period	\$ 2,314.57	
	(c) Total Receipts from Line 10b	\$ 7,352.00	\$ 354,349.50
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 9,666.57	\$ 354,402.28
7.	Total Disbursements from Line 30b	\$ 7,483.33	\$ 352,219.04
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 2,183.24	\$ 2,183.24
9.	Debits and Obligations Owed TO the Committee (Balance of an Schedule C under Schedule D)	\$	0
10.	Debits and Obligations Owed BY the Committee (Balance of an Schedule C under Schedule D)	\$	0

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

Type or Print Name of Treasurer CRAIG C. BRENTON
Signature of Treasurer [Signature] **Date** 10/22/93

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

FEC FORM 3X
 printed 1/1/91

AS AMENDED

93036652290

97043391055

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §4610(d))

Page 1 of 1
LINE NUMBER 1

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full) OREGON REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☒ NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Person	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
REBORN COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97211	BOB PACKHOUD OREGON US SENATE	PRODUCTION AND BROADCAST OF WACO AD	12/31/92	
Aggregate General Election Expenditures for this Candidate - \$				1673.34
Full Name, Mailing Address and ZIP Code of Each Person	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditures for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Person	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditures for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Person	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditures for this Candidate - \$				
SUBTOTAL of Expenditures This Page (optional)				1673.34
TOTAL This Period (see page one for number)				1673.34

RECEIVED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 20, 1995

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 4258

Dear Ms. Miller:

This letter acknowledges receipt on September 15, 1995, of the complaint you filed on behalf of the Center for Responsive Politics alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act") by the NRSC and the Oregon Republican Party. The respondent(s) 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 4258. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

97043791057



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 20, 1995

Barton Delacy, Treasurer
Oregon Republican Party
8196 SW Hall Blvd, Suite 101
Beaverton, OR 97005

RE: MUR 4258

Dear Mr. Delacy:

The Federal Election Commission received a complaint which indicates that the Oregon Republican Party ("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 4258. 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 Committee and you, as treasurer, 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.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043791058

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043791059



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 20, 1995

Stan Huckaby, Treasurer
National Republican Senatorial Committee
425 Second Street, N.E.
Washington, D.C. 20002

RE: MUR 4258

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the National Republican Senatorial Committee ("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 4258. 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 Committee and you, as treasurer, 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.

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If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043791061

National Republican Senatorial C.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 5 12 38 PM '95

SENATOR ALFONSE M. DAMATO
CHAIRMAN

JOHN D. HEUBUSCH
EXECUTIVE DIRECTOR

CRAIG M. ENGLE
GENERAL COUNSEL

Monday, October 2, 1995

Mary L. Taksar
Central Enforcement Docket
Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463

BY FAX - CONFIRM COPY

Dear Ms. Taksar,

Please find enclosed the STATEMENT OF DECLARATION OF COUNSEL for both MUR 4258 and MUR 4262.

For your information, the National Republican Senatorial Committee received your two letters dated September 20, 1995, and the enclosed copies of the complaints that have been filed with the Commission, on September 26, 1995.

To properly respond to the complaints in both MUR 4258 and MUR 4262, we request an extension to October 27, 1995. Please call me at 202-675-6073 to confirm this request, or if you have any questions.

CME/AH

*Hi Mary!
I hope everything
is great with
you.
Craig*

RONALD REAGAN REPUBLICAN CENTER

425 SECOND STREET N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000
Revised 951002

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

97043791062

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4262

NAME OF COUNSEL: Craig M. Engle

ADDRESS: 425 Second Street, N.E.

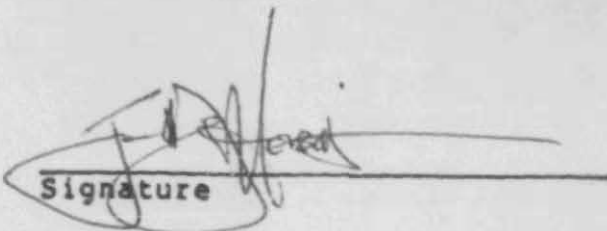
Washington, D.C. 20002-4914

TELEPHONE: 202-675-6073

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.

2 October 95

Date


Signature

RESPONDENT'S NAME: National Republican Senatorial Committee

ADDRESS: 425 Second Street, N.E.

Washington, D.C. 20002-4914

HOME PHONE: _____

BUSINESS PHONE: 202-675-6073

97043791063

STATEMENT OF DESIGNATION COUNSEL

MUR 4258

NAME OF COUNSEL: Craig M. Engle

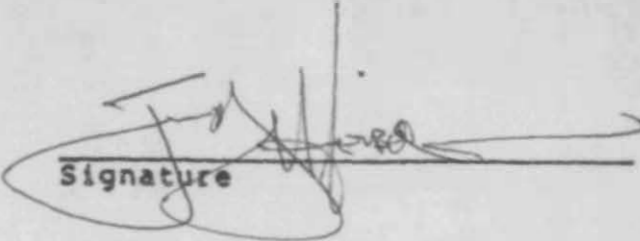
ADDRESS: 425 Second Street, N.E.

Washington, D.C. 20002-4914

TELEPHONE: 202-675-6073

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.

2 October 95
Date


Signature

RESPONDENT'S NAME: National Republican Senatorial Committee

ADDRESS: 425 Second Street, N.E.

Washington, D.C. 20002-4914

HOME PHONE: _____

BUSINESS PHONE: 202-675-6073

97043791064



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 4, 1995

Craig M. Engle, General Counsel
National Republican Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

RE: MUR 4258
National Republican Senatorial Committee and Stan
Huckaby, as treasurer

Dear Mr. Engle:

This is in response to your letter dated October 2, 1995, requesting an extension of until October 27, 1995, to respond to the complaint.

Considering the Federal Election Commission's responsibilities to act expeditiously in the conduct of investigations, the Office of General Counsel cannot grant your full request, but can only agree to an extension until October 26, 1995. Accordingly, the response is due by close of business on October 26, 1995.

If you have any questions, please contact me at (202) 219-3400.

Sincerely, .

Alva E. Smith, Paralegal
Central Enforcement Docket

97043791035

DAVIS WRIGHT TREMAINE
LAW OFFICES

2300 FIRST INTERSTATE TOWER • 1300 SW FIFTH AVENUE • PORTLAND, OR 97204-5002
(503) 241-2300 • FAX: (503) 778-5299

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

OCT 10 10 16 AM '95

STEVEN R. RINKLE
Member Oregon and Hawaii State Bars
Direct Dial: (503) 778-5421

October 5, 1995

VIA FAX NO. (202) 219-3923
ORIGINAL VIA MAIL

Alva E. Smith
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 4258; MUR 4262

Dear Ms. Smith:

As we discussed by telephone today, I represent the Oregon Republican Party with respect to the two above-referenced complaints. I am requesting an extension of time to file a response to the complaints. Specifically, I am requesting that the Federal Election Commission grant an extension of time to October 27, 1995.

The complaints were received by the Oregon Republican Party on either September 25 or September 26, 1995 (uncertain which date). The allegations in the complaint concern matters that occurred in 1992. Since that time, a new Chairman, Executive Director, Treasurer and legal counsel for the Oregon Republican Party have been elected or appointed, and locating persons with actual knowledge of the alleged events has been difficult and time consuming. Granting an extension to file the response will enable the Oregon Republican Party to more fully address the allegations contained in both complaints.

In our telephone conversation you indicated that you would inform me by telephone of the Commission's decision regarding our request prior to the 15-day deadline for filing our response. When attempting to contact me, please use the direct dial telephone number above, so that you may leave a voice-mail message for me in the event that I am not available.

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COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 10 12 48 PM '95

Alva E. Smith
October 5, 1995
Page 2

Thank you for your consideration of this matter. I am enclosing the Statement of Designation of Counsel for both of the complaints.

Very truly yours,

DAVIS WRIGHT TREMAINE



Steven R. Rinkle

Enclosures
cc: Oregon Republican Party
g:\home\rinks\gop\fec1.ltr

97043791067

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4258

NAME OF COUNSEL: Steven R. Rinkle

ADDRESS: 2300 First Interstate Tower

1300 SW Fifth Avenue

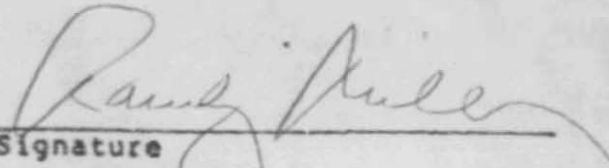
Portland, OR 97201

TELEPHONE: 503-241-2300

FAX: 503-778-5299

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.

OCT 3 1995
Date


Signature
Randy Miller, Chairman
Oregon Republican Party

RESPONDENT'S NAME: OREGON REPUBLICAN PARTY

ADDRESS: 8196 SW Hall Blvd. #101

Beaverton, OR 97008

HOME PHONE:

BUSINESS PHONE: 503-520-1996

97043791068

STATEMENT OF DESIGNATION COUNSEL

MUR 4262

NAME OF COUNSEL: Steven R. Rinkle

ADDRESS: 2300 First Interstate Tower

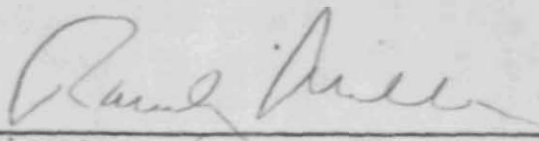
1300 SW Fifth Avenue

Portland, OR 97201

TELEPHONE: 503-241-2300

FAX: 503-778-5299

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.

OCT 3, 1995
Date
SignatureRandy Miller, Chairman
Oregon Republican Party

RESPONDENT'S NAME: OREGON REPUBLICAN PARTY

ADDRESS: 8176 SW Hall Blvd. #101

Beaverton, OR 97008

HOME PHONE:

BUSINESS PHONE: 503-520-1996

97043791069



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 1995

Steven R. Rinkle, Esq.
Davis Wright Tremaine Law Offices
1300 SW Fifth Avenue
Portland, OR 97201

RE: MUR 4258
Oregon Republican Party and Barton Delacy, as
treasurer

Dear Mr. Rinkle:

This is in response to your letter dated October 5, 1995, requesting an extension of until October 27, 1995, to respond to the complaint.

Considering the Federal Election Commission's responsibilities to act expeditiously in the conduct of investigations, the Office of General Counsel cannot grant your full request, but can only agree to an extension October 26, 1995. Accordingly, the response is due by close of business on October 26, 1995.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

9704379107C

DAVIS WRIGHT TREMAINE
LAW OFFICES

2300 FIRST INTERSTATE TOWER · 1300 SW FIFTH AVENUE · PORTLAND, OR 97201-5682
(503) 241-2300 · FAX: (503) 778-5299

STEVEN R. RINKLE
Member Oregon and Hawaii State Bars
Direct Dial: (503) 778-5421

October 10, 1995

VIA FAX NO. (202) 219-3923
ORIGINAL VIA MAIL

Alva E. Smith
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 4258; MUR 4262

Dear Ms. Smith:

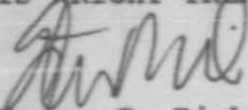
I want to confirm that, as we discussed by telephone this morning, the Federal Election Commission has extended to October 26, 1995, the deadline for the Oregon Republican Party to file a response to the above-referenced complaints. In our conversation you indicated that I will soon receive a letter from you indicating that this extension has been granted.

If I am incorrect in my understanding, please contact me immediately.

Thank you for your consideration of this matter.

Very truly yours,

DAVIS WRIGHT TREMAINE


Steven R. Rinkle

cc: Oregon Republican Party
g:\home\rinks\gop\fec2.ltr

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 16 10 12 AM '95

National Republican Senatorial Committee

SENATOR ALFONSE M. DAMATO
CHAIRMAN

JOHN D. HEUBUSCH
EXECUTIVE DIRECTOR

CRAIG H. ENGLE
GENERAL COUNSEL

October 26, 1995

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN.: Mary L. Taksar, Esq.

RE: MUR 4258 (National Republican Senatorial Committee, Maureen Goodyear as Treasurer¹)

Dear Mr. Noble:

This response is submitted on behalf of the National Republican Senatorial Committee ("NRSC" or "the committee") and Maureen Goodyear, as Treasurer, in response to a Complaint filed on September 15, 1995, by the Center for Responsive Politics and designated Matter Under Review ("MUR") 4258.

For the reasons stated herein, the Federal Election Commission ("FEC" or "Commission") should either dismiss the complaint as having already been thoroughly considered and conciliated by the Commission and the Oregon Republican Party in the context of MUR 3524, or find no reason to believe the NRSC has violated any provision of the Federal Election Campaign Act of 1971, as amended. 2 U.S.C. Sections 431-455 ("FECA" or "the Act").

COMPLAINT

The complainant alleges "on information and belief" that the NRSC and the Oregon Republican Party together made coordinated party expenditures in 1992 on behalf of Senator Bob Packwood's campaign which "exceeded the applicable coordinated expenditure limit by \$55,291.09, in violation of the FECA." The complainant urges that the Commission conduct a prompt and thorough investigation into these allegations and impose penalties for each violation. The Complainant has not, however, fully researched the public record, but is, instead, misleading the Commission into reopening a matter that has already been settled in the context of MUR 3542. Nor has the complainant alleged that the NRSC, itself, has done any act (or committed any new act not known to the Commission during its consideration of MUR 3524) that violates any provision of the FECA.

¹ See amended Statement of Organization filed October 6, 1995.

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COMMISSION
OFFICE OF GENERAL
COUNSEL
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FACTS

1. On May 31, 1991, the Republican National Committee authorized the National Republican Senatorial Committee to serve as its agent for the purpose of making 100% percent of the expenditures allowed under 2 U.S.C. Section 441a(d) in the 1992 U.S. Senate Election in Oregon. (Attachment 1).
2. On June 27, 1991, the Executive Director of the Oregon Republican Party authorized the National Republican Senatorial Committee to serve as its agent for the purpose of making 100% of the expenditures allowed under 2 U.S.C. Section 441a(d) in the State of Oregon for the 1992 general election for the office of United States Senate. (Attachment 2).
3. Accordingly, the NRSC was specifically and lawfully authorized to spend \$240,183.52 on behalf of the Republican nominee for United States Senate in Oregon in the 1992 general election. (See FEC Press release, Attachment 3).
4. The NRSC's 1992 Post-general Report on file with the Commission discloses that the NRSC spent \$240,183.04 in coordinated party expenditures on behalf of Senator Packwood, or .48 less than the amount it was entitled and authorized to spend. (Attachment 4).
5. On December 1, 1992 (which is after the NRSC made all of the coordinated party expenditures it was entitled to), the Commission determined the Oregon Republican Party misreported approximately \$55,000 it spent on certain operating expenditures. The Commission determined these expenses should have been reported as allocable coordinated party expenditures for the Packwood election. (See Attachment 9, Certification of Commission action in MUR 3425).
6. As part of the conciliation process in MUR 3425, the Oregon Republican Party was required to amend its reports on file with the Commission. The Party was required to retroactively allocate \$55,291.57 it previously reported as "operating expenditures" (for the production and placement of ads regarding Congressman AuCoin) as "coordinated party expenditures" allocable to the Packwood election. (Attachment 5, MUR 3425 Conciliation Agreement, paragraphs IV. 16, IV. 17, V. 1, VI. 5).
7. The Oregon Republican Party so amended their reports on October 22, 1993. The Complainant now uses those same amended reports to reallege the same violations the Commission settled in MUR 3425. (Note the Oregon Republican Party Reports attached to the Complaint all clearly state they are "As Amended." Attachment 6).

ANALYSIS

Fortunately, the facts giving rise to this complaint have already been conciliated, so the Commission may immediately dismiss this matter. On May 15, 1992, the Democratic Senatorial Campaign Committee filed a complaint with the Federal Election Commission (MUR 3524)

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alleging that the Oregon Republican Party "has disregarded the legal expenditure limitations of the Federal Election Campaign Act ... in its ongoing effort to secure the defeat of one of the Democratic primary Senate candidates, Congressman Les AuCoin." Complaint at 1. The specific evidence the DSCC pointed to were "newspaper articles and [] television spots attacking Congressman AuCoin [regarding] overdrafts on his account at the House Bank." Id. at 2.

The DSCC concluded that the "failure by the [Oregon] Republican Committee to account under the lawful limits for these coordinated expenditures -- and to report them -- would constitute clear violations of the FECA which, if left unconnected, would result in the Republican nominee receiving funding far in excess of the legal allowance." Id.

In response, the Oregon Republican Party maintained that the costs associated with the ads should be considered "operating expenses," and that no limits should be placed on them. The Party argued that the costs associated with the ads should not be considered against the limits of section 441a(d) because, *inter alia*, the "general election campaign of the Republican candidate had not begun. It could not have begun because neither the Republican candidate, nor anyone else, knew or could have predicted which Democratic candidate would prevail in the primary." Response at 3-5.

The FEC disagreed, and on December 1, 1992, found "reason to believe that the Oregon Republican Party and Bert Farrish, as treasurer, violated 2 U.S.C. 434(b)(6)(B)(iv)." (Attachment 9). In its analysis of the case, the General Counsel stated that "this office believes that the ads contained an electioneering message, and that the moneys spent on the advertisements in question should be considered coordinated campaign expenditures by [the Oregon Republican Party] pursuant to 2 U.S.C. §441a(d)(3)(i)." MUR 3524, First General Counsel's Report, p. 9 (Oct. 20, 1992).

As part of the Commission's conciliation agreement in this matter, the Respondents agreed that, *inter alia*²:

IV. 16. Costs associated with the radio and newspaper ads were coordinated party expenditures by the Oregon Republican Party on behalf of Senator Robert Packwood.

17. Respondents did not identify costs associated with the ads as being made to advance Senator Packwood's general election effort; rather, Respondents reported most of these costs generically as "Other Federal Operating Expenditures."

² The other violation to which the Respondent agreed concerned their impermissible use of non-federal money. That admission is not relevant here, but is relevant in the context of the NRSC's response in MUR's 4262 and 4265.

V. 1. Respondents failed to properly report costs of more than \$55,000 associated with the radio and newspaper ads critical of Les AuCoin, in violation of 2 U.S.C. 434(b)(6)(B)(iv).

VI. 5. Respondents will amend their reports on file with the Commission to accurately report all the expenditures [] for the radio and television ads as Section 441a(d) expenditures.

Conciliation Agreement, MUR 3542 (Sept. 24, 1993).

The Oregon Republican Party fully complied with the terms of this Conciliation Agreement, including the payment of a civil penalty, and on October 22, 1993, filed amended reports with the Federal Election Commission disclosing the now-allocated costs of AuCoin ads.³ It is these very same amended reports, filed because of the Commission's determination in MUR 3242, that the Complainants now wish to use as evidence of repeat violations in MUR 4258.

Although the National Republican Senatorial Committee does not wish to contest the Commission's finding that the AuCoin ads should have been allocable to the coordinated limit for the 1992 Packwood election, we do strongly contest any attempt by the complainants to reopen this matter on items that have already been settled. As the Conciliation Agreement in MUR 3524 clearly states:

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

The doctrines of *collateral estoppel* (when an issue of fact or law has been determined by a valid judgment, there is a bar to retrying the issue between the same parties or their privies) and *res judicata* (a final judgment on the merits is conclusive as to the rights of the parties and their privies, and constitutes an absolute bar to a subsequent action involving the same claim) operate as a bar to the Commission reopening this matter, and remaking findings or reissuing penalties for the same activity that was completely settled in MUR 3524.

³ These reports were filed on October 22, 1993, within the 30 day period given to the respondents in the FEC's letter dated September 24, 1993.

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Simply stated, once the Commission has decided an issue, the matter should be considered finally decided, and all interested parties must be able to rely upon the matter being closed. The reports to which the Complainant points as evidence of an excessive expenditure are exactly the same reports the Commission instructed the Oregon Republican party to file in conciliation of MUR 3524. And further, the Commission's investigation and final decision in that matter occurred after the NRSC made and accurately reported all of its lawful coordinated expenditures in this case. Accordingly, the Commission should dismiss this complaint as it is authorized to do under 2 U.S.C. 437g(a)(1).

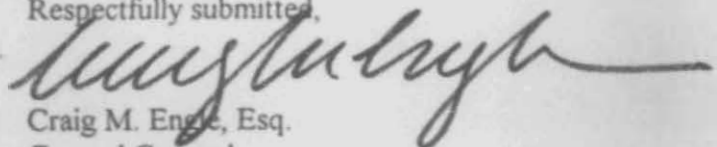
In the alternative, the Commission should find no reason to believe the NRSC violated the limits of 2 U.S.C. §441a(d) based on the facts in this case. The NRSC was authorized by the Republican National Committee and the Oregon Republican Party to make all the coordinated expenditures for the 1992 U.S. Senate election in Oregon. In fact, the records on file with the Commission clearly show that the NRSC actually spent less than the coordinated limit it was given, so the NRSC has stayed within the lawful limits of 2 U.S.C. §441a(d).

Further, the NRSC did not know of, approve, or authorize the Oregon Republican Party's expenditure at issue in MUR 3524. As stated on page two of the Oregon Republican Party's December 18, 1992, response in MUR 3524, and in paragraph 4 of the December 22, 1992, affidavit of Bert Farrish (Treasurer of the Oregon Republican Party) the "decision to make the expenditures for the above radio and newspaper advertisements was made by the Chairman of the Oregon Republican Party." The expenditures were not made at the request or suggestion of the NRSC, nor did the NRSC know (or could have it known) that the AuCoin expenditures constituted a coordinated party expenditure since that decision was made by the Commission one month after the NRSC made its last coordinated expenditure in the Packwood election. (See Attachments 4 and 9). Accordingly, there is no reason to believe the NRSC committed any violation of 2 U.S.C. 441a(d).

CONCLUSION

The Commission has already dealt with this matter. Although the National Republican Senatorial Committee does not agree with the Commission's decision in MUR 3524, it should be able to rely upon it, and the Commission should dismiss this complaint as a matter of law. If the Commission chooses to go further (and the NRSC believes that it is estopped from so doing) and address the facts of this case, it should find no reason to believe the Senatorial Committee violated any provision of the FECA.

Respectfully submitted,



Craig M. Engle, Esq.
General Counsel

National Republican Senatorial Committee

Enclosures as indicated

97043791076

ATTACHMENT 1

Agreement between NRSC and The Republican National Committee
Authorizing the NRSC to Make 100% of the
Coordinated Expenditures

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AGREEMENT OF AGENCY

By this agreement, and for valuable consideration which consideration is received, the Republican National Committee authorizes the National Republican Senatorial Committee to serve as the agent of the Republican National Committee for the purpose of making 100% of the expenditures allowed under 2 U.S.C. 441a(d)(3) in the following states for the 1991 and 1992 Senatorial elections:

1991

Pennsylvania

1992

Alabama
Alaska
Arizona
Arkansas
California
Colorado
Connecticut
Florida
Georgia
Hawaii
Idaho
Illinois
Indiana
Iowa
Kansas
Kentucky
Louisiana

Maryland
Missouri
Nevada
New Hampshire
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Pennsylvania
South Carolina
South Dakota
Utah
Vermont
Washington
Wisconsin

Clayton Yeutter
Clayton Yeutter, Chairman
Republican National Committee

May 31, 1991
Date

Phil Gramm
Senator Phil Gramm, Chairman
National Republican Senatorial
Committee

May 23, 1991
Date

97043791078

ATTACHMENT 2

Agreement between NRSC and Oregon Republican Party
Authorizing the NRSC to Make 100% of the
Coordinated Expenditures

97043791079

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

AGREEMENT

By this agreement, and for valuable consideration which consideration is received, the Oregon Republican Party authorizes the National Republican Senatorial Committee to serve as its agent for the purpose of making one-hundred percent (100%) of the expenditures allowed under 2 U.S.C. 441a(d)(3) in the State of Oregon for the 1992 general election for the office of United States Senate.

By signature below, Dick Noonan hereby represents that he is authorized to enter into this Agreement.

Dick Noonan

Dick Noonan
Executive Director
Oregon Republican Party
9900 SW Greenburg Rd.
Suite 150
Portland, Oregon 97223

Jeb Hensarling

Jeb Hensarling
Executive Director
National Republican Senatorial
Committee
425 Second Street, NE
Washington, D.C. 20002

27 Jun 91
Date

Date

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. * WASHINGTON, D.C. 20002 * (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

9704379108C

ATTACHMENT 3.

1992 State-by-State Coordinated Party Expenditure Limits for Senate Nominees

97043791081

FEDERAL ELECTION COMMISSION



Press Office

999 E Street, N.W., Washington, D.C. 20463

Phone: Local 202-219-4155

Toll Free 800-424-9530

FOR IMMEDIATE RELEASE
FEBRUARY 28, 1992
[CORRECTED MARCH 6, 1992]

CONTACT: FRED EILAND
SHARON SNYDER
SCOTT MOXLEY

FEC ANNOUNCES 1992 PARTY SPENDING LIMITS --AMOUNTS RANGE FROM \$110,480 TO \$2.5 MILLION--

WASHINGTON -- The Federal Election Commission today announced the 1992 general election spending limits for national and state political party committees.

Amounts for Senate campaigns will range from a low of \$110,480 in Alaska, to a high of \$2,454,644.64 for each of the California Senate races.

These general election expenditures, known as "coordinated expenditures", are limited under the election law. The national committees of each political party have a set amount they may spend on behalf of each U.S. House and Senate candidate. State party committees may spend equal amounts or may transfer their limits to the national committees, effectively doubling the national committees' expenditure limits in those states or districts.

Coordinated expenditures are made in addition to direct contributions. They are allowed only with regard to the general election, and do not count as either contributions to candidates or as expenditures made by candidates. Party committees may work with candidates' campaigns to determine how the money should be spent, but the campaigns do not receive the funds, the expenditures are reported directly by the party committees on special schedules on their financial disclosure reports.

CORRECTED PARAGRAPH--

The election law sets the limit for House races at \$10,000, plus a cost-of-living adjustment (COLA). For 1992, that limit is \$27,620, except in states with only one congressional district, where the limit will be \$55,240.

The limits for Senate races are based on state voting age populations (VAP), with a base limit for states with smaller populations. The formula for determining a state's limit is:

\$.02 x State VAP + Cost-of-Living

-or-

\$20,000 + Cost-of-Living

-whichever is greater

The following page lists party expenditure limits for each state.

-more-

97043791082

1992 STATE-BY-STATE COORDINATE PARTY
EXPENDITURE LIMITS FOR SENATE NOMINEES

State	VAP (in thousands)	1992 Limit
Alabama	3,018	\$ 166,714.32
*Alaska	391	55,240.00
Arizona	2,740	151,357.60
Arkansas	1,746	96,449.04
California	22,218	1,227,322.32
Colorado	2,493	137,713.32
Connecticut	2,527	139,591.48
*Delaware	512	55,240.00
Florida	10,280	567,867.20
Georgia	4,848	267,803.52
Hawaii	846	55,240.00
Idaho	721	55,240.00
Illinois	8,545	472,025.80
Indiana	4,144	228,914.56
Iowa	2,069	114,291.56
Kansas	1,822	100,647.28
Kentucky	2,754	152,130.96
Louisiana	3,018	166,714.32
Maine	924	55,240.00
Maryland	3,659	202,123.16
Massachusetts	4,622	255,319.28
Michigan	6,884	380,272.16
Minnesota	3,243	179,143.32
Mississippi	1,841	101,696.84
Missouri	3,818	210,906.32
Montana	585	55,240.00
Nebraska	1,158	63,967.92
Nevada	962	55,240.00
New Hampshire	824	55,240.00
New Jersey	5,919	326,965.56
New Mexico	1,089	60,156.36
New York	13,691	756,290.84
North Carolina	5,094	281,392.56
*North Dakota	461	55,240.00
Ohio	8,120	448,548.80
Oklahoma	2,330	128,709.20
Oregon	2,174	120,091.76
Pennsylvania	9,132	504,451.68
Rhode Island	774	55,240.00
South Carolina	2,622	144,839.28
*South Dakota	503	55,240.00
Tennessee	3,723	205,658.52
Texas	12,380	683,871.20
Utah	1,128	62,310.72
*Vermont	422	55,240.00
Virginia	4,748	262,279.52
Washington	3,703	204,553.72
West Virginia	1,364	75,347.36
Wisconsin	3,644	201,294.56
*Wyoming	323	55,240.00

*In these states, the Senate limit also applies to the House nominee.

ATTACHMENT 4

NRSC Report of Receipts and Disbursements
for Other Than an Authorized Committee

Thirtieth Day Report

97043791084

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE PRE-PAID MAIL LABEL
FOR TYPE C REPORT

NAME OF COMMITTEE or IND

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

ADDRESS (number and street) Check if different than previously reported

425 SECOND STREET, N.E.

CITY STATE AND ZIP CODE

WASHINGTON, DC 20002

OFFICE OF THE CLERK

1. FEC IDENTIFICATION NUMBER

C00027466

2. This committee qualified as a multicandidate committee DURING THIS Reporting Period or

4. TYPE OF REPORT

(a) April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year-End Report

July 31 Mid-Year Report (Non-election Year Only)

Monthly Report Due On

February 20

June 20

October 20

March 20

July 20

November 20

April 20

August 20

December 20

May 20

September 20

January 21

Twelfth day report including

Type of Election

election or

in the State of

1. Twelfth day report following the General Election of

11-03-92

in the State of

Termination Report

(b) Is the Report an Amendment? YES NO

SUMMARY

1. a. Covering Period 10-15-92 through 11-23-92

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

2. a. Cash on hand January 1, 1992

\$ (671,901.07)

3. a. Cash on hand at Beginning of Reporting Period

\$ 43,470.54

4. a. Total Receipts from Line 1b

\$ 6,361,635.09

5. a. Subtotal (add Lines 3b and 4a) for Column A and

\$ 6,405,105.63

Line 3b and 4a for Column B

\$ 46,917,946.10

6. Total Disbursements from Line 2b

\$ 5,930,291.04

\$ 46,463,131.51

7. Cash on hand at Close of Reporting Period (subtract Line 6 from Line 5 c)

\$ 474,814.56

\$ 474,814.54

8. Debt and Obligations Owed TO the Committee

\$ 49,420.33

Remove all on Schedule C and/or Schedule D

9. Debt and Obligations Owed BY the Committee

\$ 3,836,942.88

Remove all on Schedule C and/or Schedule D

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

Type or Print Name of Treasurer

JAMES L. BACON

Signature of Treasurer

James L. Bacon

Date

12-03-92

NOTE: Submission of false information or misleading information may subject the person signing this Report to the penalties of 2 U.S.C. § 4370.

FEC FORM 3X

Revised 11-91

9202023 0157

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 14-1160)

Page 3 of 19
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: []			
[] NC			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE [SUPPORTED, STATE, DISTRICT] and Office sought	Date (month, day, yr)	Amount
WILSON COMMUNICATION SERVICES 407 N. WASHINGTON STREET ALEXANDRIA VA 22314	JACK DALRYMPLE U.S. SENATE NORTH CAROTA	11/19/92	2000.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		110480.00
MEDIA SOLUTIONS 1422 BROADLAND ROAD NW ATLANTA GA 30342	PAUL COVERDELL U.S. SENATE GEORGIA	11/27/92	72247.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		1535607.00
GANN PUBLISHING COMPANY 1410 NW JOHNSON STREET PORTLAND OR 97209	BOB PACKWOOD U.S. SENATE OREGON	11/27/92	57256.32
PURPOSE OF EXPENDITURE PRINTING SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		1240183.04
MISSOURI PRESS SERVICE 18TH & LOCUST COLUMBIA MO 65201	KIT BOAD U.S. SENATE MISSOURI	11/30/92	15000.54
PURPOSE OF EXPENDITURE ADVERTISING SERVICE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		1379904.15
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			1111509.81
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY Page 4 of 19
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS Line Number 25
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2 U.S.C. 1441a(d))

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NC			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE	Date
		SUPPORTED, STATE, DISTRICT	(month, day, yr)
		(and Office sought)	
			Amount
BARNHART ADVERTISING, MKTING., 455 SHERMAN STREET, DENVER CO 80203		TERRY CONSIDINE	110/30/92
		U.S. SENATE	
		COLORADO	
PURPOSE OF EXPENDITURE		AGGREGATE GEN. ELEC. EXPEND.	
MEDIA SERVICE		FOR CANDIDATE - 9275426.64	
JOHNSON, HEATH, NELSON & 9239 THREE OAKS DRIVE, SILVER SPRING MD 20901		JOHN MCCAIN	110/20/92
		U.S. SENATE	
		ARIZONA	
PURPOSE OF EXPENDITURE		AGGREGATE GEN. ELEC. EXPEND.	
TELEMARKETING		FOR CANDIDATE - 9302529.76	
CAMPAIGN TEL LTD., 7556 THIRD AVENUE, NEW YORK NY 10128		KIT BOND	110/23/92
		U.S. SENATE	
		MISSOURI	
PURPOSE OF EXPENDITURE		AGGREGATE GEN. ELEC. EXPEND.	
MEDIA SERVICE		FOR CANDIDATE - 9379906.15	
SCOTSWEST PUBLISHING AND 12600 NW TOPEKA BLVD, TUCPEKA KS 66617		BOB PACKWOOD	110/15/92
		U.S. SENATE	
		OREGON	
PURPOSE OF EXPENDITURE		AGGREGATE GEN. ELEC. EXPEND.	
DIRECT MAIL EXPENSE		FOR CANDIDATE - 9240183.04	
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			80,531.94
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 441a(d))

Page 1 of 15
Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: []			
[] NO			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE	Date	Amount
	SUPPORTED, STATE, DISTRICT	(month, day, yr)	
	and Office sought		
SOUTHWEST PUBLISHING AND 22400 NW TOPEKA BLVD TOPEKA KS 66617	BOB PACKWOOD U.S. SENATE OREGON	11/15/92	3774.99
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	8240183.04	
SOUTHWEST PUBLISHING AND 22400 NW TOPEKA BLVD TOPEKA KS 66617	BOB PACKWOOD U.S. SENATE OREGON	11/15/92	669.16
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	8240183.04	
KARL RYCE & COMPANY P.O. BOX 1902 AUSTIN TX 78767	BOB KASTEN U.S. SENATE WISCONSIN	11/16/92	4432.26
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	8402589.12	
KARL RYCE & COMPANY P.O. BOX 1902 AUSTIN TX 78767	BOB KASTEN U.S. SENATE WISCONSIN	11/16/92	30449.06
PURPOSE OF EXPENDITURE	AGGREGATE GEN. ELEC. EXPEND.		
DIRECT MAIL EXPENSE	FOR CANDIDATE -	8402589.12	
SUBTOTAL OF EXPENCITURES THIS PAGE (optional)			39,325.47
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 441a(d))

Page 8 OF 15

Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO []			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT and Office sought	Date (month, day, yr)	Amount
KARL ROVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767	KIT BOND U.S. SENATE MISSOURI	11/22/92	9959.20
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		\$379904.15
THE POSTMASTER F: PHOENIX AZ 85026	JOHN MCCAIN U.S. SENATE ARIZONA	11/22/92	20456.00
PURPOSE OF EXPENDITURE POSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		\$302529.76
THE POSTMASTER F: PORTLAND OR 97208	BOB PACKWOOD U.S. SENATE OREGON	11/22/92	150.00
PURPOSE OF EXPENDITURE POSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		\$240183.04
ARTHUR J. FINKELSTEIN & ASSOC 116 NORTH ASTOR IRVINGTON NY 10533	ALFONSE D'AMATO U.S. SENATE NEW YORK	11/26/92	4825.00
PURPOSE OF EXPENDITURE SURVEY RESEARCH	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -		\$1512543.00
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			35,390.20
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE P ITEMIZED COORDINATED EXPENDITURES MADE BY Page 10 OF 15
 POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) Line Number 25
 ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
 (2 U.S.C. 6441e(d))

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: [] NO []			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee		NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT and Office sought	Date (month, day, yr) Amount
KARL ROVE & COMPANY P.O. BOX 1902 AUSTIN TX 78767		KIT BOND U.S. SENATE MISSOURI	10/26/92 119618.10
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8379904.15
PCORE LITHOGRAPH INC. 4447 NE GLISAN STREET PORTLAND OR 97213		BOB PACKWOOD U.S. SENATE OREGON	10/26/92 30067.50
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8240183.04
AC & R PRINTING & MAILING INC. 12949 ACRTM 31ST AVENUE PHOENIX AZ 85017		JOHN MCCAIN U.S. SENATE ARIZONA	10/26/92 1670.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8302529.76
ARIZONA REPUBLICAN PARTY 13901 ACRTM 24TH STREET PHOENIX AZ 85016		JOHN MCCAIN U.S. SENATE ARIZONA	10/26/92 3449.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE		AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8302529.76
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			155,004.60
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE F ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. 1441a(d))

Page 13 of 15

Line Number 25

(To be used by Political Committees in the General Election)

NAME OF COMMITTEE			
NATIONAL REPUBLICAN SENATORIAL COMMITTEE - EXPENDITURES			
Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: []			
[] NC			
Full Name, Mailing Address and Zip Code of Subordinate Committee			
FULL NAME, MAILING ADDRESS and ZIP of Each Payee	NAME OF FEDERAL CANDIDATE SUPPORTED, STATE, DISTRICT and Office sought	Date (month, day, yr)	Amount
PCORE LITHOGRAPH, INC. 4447 NE GLISAN STREET PORTLAND, OR 97213	BOB PACKWOOD U.S. SENATE OREGON	10/30/92	2450.00
PURPOSE OF EXPENDITURE REFUND-PCSTAGE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8240183.04	
MEDIA SOLUTIONS 1422 BROADLAND ROAD NW ATLANTA, GA 30342	PAUL COVERDELL U.S. SENATE GEORGIA	11/20/92	535607.00
PURPOSE OF EXPENDITURE MEDIA SERVICE	AGGREGATE SPEC. ELEC. EXPEND. FOR CANDIDATE -	8535607.00	
OPTIMA DIRECT, INC. 1000 VERMONT AVENUE NW WASHINGTON, DC 20005	BOB PACKWOOD U.S. SENATE OREGON	11/02/92	29000.00
PURPOSE OF EXPENDITURE TELEMARKETING	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8240183.04	
INM, INC. 1505 CAPITOL CCLRT, NE WASHINGTON, DC 20002	BOB PACKWOOD U.S. SENATE OREGON	11/11/92	2716.00
PURPOSE OF EXPENDITURE DIRECT MAIL EXPENSE	AGGREGATE GEN. ELEC. EXPEND. FOR CANDIDATE -	8240183.04	
SUBTOTAL OF EXPENDITURES THIS PAGE (optional)			564,673.00
TOTAL THIS PERIOD (last page this line number only)			

ATTACHMENT 5

Conciliation Agreement for MUR 3524

97043791092

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Oregon Republican Party and) MUR 3524
Craig C. Brenton, treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Democratic Senatorial Campaign Committee. The Federal Election Commission ("Commission") found reason to believe that the Oregon Republican Party and its then-treasurer, Bert Farrish, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(6)(B)(iv) and 441b(a); and 11 C.F.R. § 102.5(a)(1)(i).

NOW, THEREFORE, the Commission and the Oregon Republican Party and its current treasurer, Craig C. Brenton ("Respondents"), having participated in informal methods of conciliation, prior to findings of probable cause to believe, do hereby agree as follows:

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

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

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

IV. The pertinent facts in this matter are as follows:

1. The Oregon Republican Party is a State committee within the meaning of 2 U.S.C. § 431(15).

97,043,409,69473

2. Craig C. Brenton is the treasurer of the Oregon Republican Party. Neither Craig C. Brenton nor any other current officer of the Oregon Republican Party was an officer of the Party at the time the events which are the subject of this agreement took place.

3. Senator Robert Packwood was the presumptive candidate of the Oregon Republican Party for the 1992 Oregon general election for the U.S. Senate at the time of the events in this matter.

4. At the time of the events in this matter, Representative Les AuCoin and businessman Harry Lonsdale were running in the Democratic primary election to be that party's U.S. Senate candidate in the 1992 Oregon general election.

5. Robeson Marketing Communications is an unincorporated business which provided services relating to the production and placement of the newspaper and radio ads which are the subject of this matter.

6. Pursuant to 2 U.S.C. § 441a(d)(3), a State committee of a political party may not make any expenditure in connection with the general election campaign of any candidate for the office of Senator who is affiliated with that party, which exceeds the greater of two cents multiplied by the voting age population of the State, or \$20,000. For the 1992 election cycle, the State committee in Oregon was allowed to spend up to \$120,091.76 on such expenditures for its candidate. See FEC Record, Volume 18, Number 3 (March 1992).

97,034,340,869,419

7. A State committee such as the Party must report such expenditures, known as coordinated campaign expenditures, separately. See 11 C.F.R. § 104.3(b)(1)(viii). A party does not have to consult or coordinate with the candidate for a coordinated campaign expenditure to occur. See Advisory Opinion 1984-15.

8. In reporting coordinated campaign expenditures, a committee must include the name of the person receiving such expenditures; the date, amount and purpose of such expenditures; and the name of, and office sought by, the candidate on whose behalf the expenditure is made. See 2 U.S.C. § 434(b)(6)(B)(iv).

9. A communication is considered to be "in connection with a general election," and thus a coordinated campaign expenditure, where it both depicts a clearly identified candidate and conveys an electioneering message. See Advisory Opinion 1984-15.

10. Every report filed by a committee shall disclose the identification of every person who makes a contribution when that contribution is in excess of \$200 within the calendar year, together with the date and amount of any such contribution. See 2 U.S.C. § 434(b)(3)(A). The term contribution includes the provision of any service at a charge that is less than the usual and normal charge. See 11 C.F.R. § 100.7(a)(1)(iii)(A). If a service is provided at less than the usual and normal charge, the amount of the contribution is the difference between the usual and normal charge for the service at the time of the contribution and the amount charged to the political committee. Id.

97043409100420

11. Pursuant to 2 U.S.C. § 441b(a), it is unlawful to use corporate or labor union monies in connection with a federal election. Oregon law allows a state political committee to accept contributions from corporations and labor unions.

12. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), a political committee must establish a separate federal account, and must make all disbursements, contributions, expenditures and transfers in connection with a federal election from this account.

13. On March 26 and 29, 1992, the Oregon Republican Party, without consulting or coordinating with Senator Packwood, ran a newspaper ad in The Oregonian which criticized Representative AuCoin for bouncing checks at the bank at the U.S. House of Representatives. The ad clearly identified Representative AuCoin, and suggested that, because of his involvement with the House Bank, he was out of touch with the voters of Oregon. As a result, the newspaper ad sought to diminish Representative AuCoin's support in the primary election. The cost of production and placement of this ad totalled \$12,409.48.

14. In the week preceding the May 19th primary election, the Oregon Republican Party, without consulting or coordinating with Senator Packwood, broadcast a radio ad which also criticized Representative AuCoin for bouncing checks at the House Bank. The radio ad clearly identified Representative AuCoin, and suggested that he was lying to the voters of Oregon regarding his involvement with the House Bank. The Oregon Republican Party spent \$42,886.09 on the production and broadcast of this ad.

97043791006
43406J421

15. The newspaper and radio ads were intended to help Senator Packwood in the general election either by helping to defeat Representative AuCoin in the Democratic primary election and enabling Senator Packwood to face a perceived weaker candidate in the general election, or helping to weaken Les AuCoin for the general election contest against Senator Packwood.

16. Costs associated with the radio and newspaper ads were coordinated campaign expenditures by the Oregon Republican Party on behalf of Senator Robert Packwood.

17. Respondents did not identify costs associated with the ads as being made to advance Senator Packwood's general election effort; rather, Respondents reported most of these costs generically as "Other Federal Operating Expenditures."

18. The Oregon Republican Party pre-paid Robeson Marketing Communications \$9,991.73 for the media placements for the newspaper ad. The first of two invoices for the newspaper ad totaled \$292.80 more than the Party had pre-paid. Robeson forgave the \$292.80 rather than requiring payment by the Party.

19. Respondents did not report this in-kind contribution by Robeson Marketing Communications.

20. The Oregon Republican Party pre-paid Robeson Marketing Communications \$43,334.00 for the remaining fees and expenses for the newspaper ad and for all fees and expenses relating to the radio ads. When the actual bill came to more than \$45,000, Robeson drew upon funds previously paid to it from the Oregon Republican Party's non-federal account for payment of the balance of approximately \$1,670.

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11. The Oregon Republican Party contends that Robeson applied the funds previously paid from the party's non-federal account without the consent of the Party. However, until notified of an apparent violation by Commission staff some seven months later, the Party did not seek reimbursement of any of the amounts applied from its non-federal account and did not begin its efforts to satisfy the remainder of the bill with clean funds from its federal account.

V. 1. Respondents failed to properly report costs of more than \$55,000 associated with the radio and newspaper ads critical of Les AuCoin, in violation of 2 U.S.C. § 434(b)(6)(B)(iv).

2. Respondents failed to report receipt of an in-kind contribution from Robeson Marketing Communications, in violation of 2 U.S.C. § 434(b)(3)(A).

3. Respondents used funds prohibited by the Act to pay part of the costs at issue in this matter, in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Ten Thousand dollars (\$10,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$1,000 due sixty days from the effective date of this agreement;

2. Thereafter, nine consecutive monthly installment payments of \$1,000 each;

3. Each such installment shall be paid thirty days from the date of the previous installment;

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3406J423

4. In the event that any installment payment is not received by the Commission within five days of the date it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

5. Respondents will amend their reports on file with the Commission to accurately report all the expenditures (including the in-kind contribution) for the radio and television ads as Section 441a(d) expenditures.

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

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the

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requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

[Signature]
Lois G. Werner
Associate General Counsel

Date

September 24, 1993

FOR THE RESPONDENTS:

Craig Bantons
(Name)
(Position) *Treasurer*

Date

July 22, 1993

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ATTACHMENT 6

Amended Reports of the Oregon Republican Party

97043791101

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE ON FRONT

1. NAME OF COMMITTEE in full <u>OREGON REPUBLICAN PARTY</u>		2. FEC IDENTIFICATION NUMBER <u>C 00153031</u>
ADDRESS (number and street) ☒ Check if different than previously reported <u>8196 SW HALL BLVD. SUITE 101</u>		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period or (1992)
CITY, STATE and ZIP CODE <u>BEAVERTON, OR 97005</u>		

4. TYPE OF REPORT

- (a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On:
☐ February 30 ☐ June 30 ☐ October 30
☐ March 30 ☐ July 30 ☐ November 30
☐ April 30 ☐ August 30 ☐ December 30
☐ May 30 ☐ September 30 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is the Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>01/01/92</u> through <u>03/31/92</u>		
6	(a) Cash on Hand January 1, 19 <u>92</u>		\$ <u>52.78</u>
	(b) Cash on Hand at Beginning of Reporting Period	\$ <u>52.78</u>	
10	Total Receipts from Line 19:	\$ <u>38,191.11</u>	\$ <u>38,191.11</u>
10	Subtotal (add Lines 8(b) and 9(c) for Column A and Lines 8(a) and 9(c) for Column B)	\$ <u>38,243.89</u>	\$ <u>38,243.89</u>
7	Total Disbursements from Line 30:	\$ <u>34,394.63</u>	\$ <u>34,394.26</u>
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6 c)	\$ <u>3,849.26</u>	\$ <u>3,849.26</u>
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$	

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

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20462
Toll Free 800-424-9530
Local 202-719-3420

Type or Print Name of Treasurer <u>CRIS E. BRENTON</u>	Date <u>10/27/93</u>
Signature of Treasurer <i>[Signature]</i>	

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

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FEC FORM 3X
(Revised 5/1991)

AS AMENDED

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SCHEDULE F

**STANDARD COORDINATED DISCLOSURE MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(U.S.C. § 441a-1)**

Page 1 of 1
LINE NUMBER

(To be used only by Political Committees in the General Election)

Name of Political Committee on File				
OREGON REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☒ NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee:				
Full Name, Mailing Address and ZIP Code of Each Person	Name of Federal Candidate Supported, Race, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
ROBSON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97211	BOB PACKWOOD OREGON US SENATE	MEDIA PLACEMENT FOR NEWSPAPER AD.	03-25 -92	
Aggregate General Election Expenditures for this Candidate—\$				3841.43
ROBSON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97211	BOB PACKWOOD OREGON US SENATE	MEDIA PLACEMENT FOR NEWSPAPER AD.	03-27 -92	
Aggregate General Election Expenditures for this Candidate—\$				1500.00
ROBSON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97211	BOB PACKWOOD OREGON US SENATE	MEDIA PLACEMENT FOR NEWSPAPER AD.	03-27 -92	
Aggregate General Election Expenditures for this Candidate—\$				1500.00
ROBSON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON US SENATE	MEDIA PLACEMENT FOR NEWSPAPER AD.	03-27 -92	
Aggregate General Election Expenditures for this Candidate—\$				1500.00
SUBTOTAL of Expenditures This Page (continued)				6841.43
TOTAL This Period (Use page this line number only)				

AS AMENDED

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 4410a(d))**

Page 2 of 2 to
LINE NUMBER 11

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)					
OREGON REPUBLICAN PARTY					
Has your Committee been authorized to make coordinated expenditures by a political party committee? YES AND					
If YES, name the designating committee					
Full Name, Mailing Address and ZIP Code of Subordinate Committee					
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount	
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON US SENATE	MAKE A PACEMENT FOR NEWSPAPER AD.	03-27 -92	1500.00	
Aggregate General Election Expenditures for this Candidate - \$					
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON US SENATE	MAKE A PACEMENT FOR NEWSPAPER AD.	03-27 -92	150.00	
Aggregate General Election Expenditures for this Candidate - \$					
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97201	BOB PACKWOOD OREGON US SENATE	IN-KIND CONTRIBUTION - MAKE A PACEMENT FOR NEWSPAPER AD.	03-27 -92	290.80	
Aggregate General Election Expenditures for this Candidate - \$					
SubTOTAL of Expenditures This Page (add lines 1-3)					
TOTAL This Period (add page this line number 0000)					

MS HATCHER

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE ON FRONT

1. NAME OF COMMITTEE on file OREGON REPUBLICAN PARTY		2. FEC IDENTIFICATION NUMBER C00153031
ADDRESS (number and street) ☒ Check if different than previously reported 8196 SW HALL BLVD, SUITE 101		3. ☐ This committee qualified as a multi-member committee DURING THIS Reporting Period
CITY, STATE and ZIP CODE BEAVERTON OR 97005		

4. TYPE OF REPORT

☐ April 15 Quarterly Report
☒ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
 February 30 June 30 October 30
 March 30 July 30 November 30
 April 30 August 30 December 30
 May 30 September 30 January 31

☐ Twelfth day report preceding _____ (Type or Election)
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____

Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period 04/01/92 through 06/30/92		
6	(a) Cash on Hand January 1, 19 92		\$ 52.78
	(b) Cash on Hand at Beginning of Reporting Period	\$ 3,849.26	
	(c) Total Receipts (from Line 19)	\$ 62,456.00	\$ 100,647.11
	(d) Success (add Lines 6(b) and (c) for Column A and Lines 6(a) and (c) for Column B)	\$ 66,305.26	\$ 100,699.89
7	Total Disbursements (from Line 20)	\$ 72,564.32	\$ 106,958.95
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <6,259.06>	\$ <6,259.06>
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C except Schedule D)	\$	
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C except Schedule D)	\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
 Type or Print Name of Treasurer: **CRAIG C. BRENTON**
 Signature of Treasurer: *[Signature]* Date: **10/22/93**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

FEC FORM 278
Revised 1/89

AS AMENDED

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 441a(d))

Page 1 of 1
LARRY HANSEN

(To be used only by Political Committees in the General Election)

Name of Political Committee (See Part I)				
OREGON REPUBLICAN PARTY				
Has your Committee been organized to make coordinated expenditures by a political party committee? YES ☐ NO ☒				
If YES, name the coordinating committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (Month, day, year)	Amount
ROBESON COMMUNICATIONS 5201 NE 35TH PORTLAND, OR 97213	BOB PALKWOOD OREGON U.S. SENATE	PRODUCTION AND BROADCAST OF RADIO AD.	05-07 -92	
Aggregate General Election Expenditures for this Candidate - \$				1550.00
ROBESON COMMUNICATIONS 5201 NE 35TH ST PORTLAND, OR 97211	BOB PALKWOOD OREGON U.S. SENATE	PRODUCTION AND BROADCAST OF RADIO AD.	05-11 -92	
Aggregate General Election Expenditures for this Candidate - \$				41794.00
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (Month, day, year)	Amount
Aggregate General Election Expenditures for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (Month, day, year)	Amount
Aggregate General Election Expenditures for this Candidate - \$				
SUBTOTAL of Expenditures This Page (see note)				43334.00
TOTAL This Period (list page this and number only)				43334.00

AS AMENDED

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAIL LABEL
OR
TYPE ON PRINT

1. NAME OF COMMITTEE (in full) OREGON REPUBLICAN PARTY		2. FEC IDENTIFICATION NUMBER C 00153031
ADDRESS (number and street) ☒ Check if different than previously reported 8196 SW HALL BLVD, SUITE 101		3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____
CITY, STATE AND ZIP CODE BEAVERTON, OR 97005		

4. TYPE OF REPORT

(A) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:
☐ February 28 ☐ June 30 ☐ October 30
☐ March 30 ☐ July 30 ☐ November 30
☐ April 30 ☐ August 30 ☐ December 30
☐ May 30 ☐ September 30 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(B) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>11/24/92</u> through <u>12/31/92</u>		
6. (a) Cash on Hand January 1, 19 <u>92</u>			\$ 52.78
(b) Cash on Hand at Beginning of Reporting Period		\$ 2,314.57	
(c) Total Receipts (from Line 19)		\$ 7,352.00	\$ 354,349.50
(d) Subtract (add Lines 8(b) and 8(c) for Column A and Lines 8(a) and 8(c) for Column B)		\$ 9,666.57	\$ 354,402.28
7. Total Disbursements (from Line 20)		\$ 7,483.33	\$ 352,219.04
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 2,183.24	\$ 2,183.24
9. Debts and Obligations Owed TO the Committee (Reported all on Schedule C and/or Schedule D)		\$ 0	
10. Debts and Obligations Owed BY the Committee (Reported all on Schedule C and/or Schedule D)		\$ 0	

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

Type or Print Name of Treasurer: **CRAIG C. BRENTON**

Signature of Treasurer: *Craig C. Brenton* Date: **10/22/93**

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

FEC FORM 3X

Revised 10/91

AS AMENDED

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 441a(d))

Page 1 of 1
LINE NUMBER

(To be used only by Political Committees in the General Election)

Name of Political Committee (or Full)				
OREGON REPUBLICAN PARTY				
Has your Committee been designated to make coordinated expenditures by a Political Party committee? YES ☐ NO ☒				
If YES, name the designating committee				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Party	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
LIBSON COMMUNICATIONS 5101 NE 35TH PORTLAND, OR 97211	BON PACAHOOD OREGON US SENATE	PRODUCTION AND BROADCAST OF AIRC AD	12/31/92	
	Aggregate General Election Expenditures for this Candidate - \$			1673.34
Full Name, Mailing Address and ZIP Code of Each Party				
Aggregate General Election Expenditures for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Party				
Aggregate General Election Expenditures for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Party				
Aggregate General Election Expenditures for this Candidate - \$				
SUBTOTAL of Expenditures This Page (optional)				1673.34
TOTAL This Period (last page must use number 9999)				1673.34

A. AMENDED

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ATTACHMENT 7

Letter from Mark W. Eves to the Commission Dated December 18, 1992

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MARK W. EVES
RONALD L. WADE

EVES & WADE
ATTORNEYS AT LAW
SUITE 200
3236 S.W. KELLY AVENUE
PORTLAND, OREGON 97201-4174
(503) 227-6226
FAX (503) 227-4971

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OF COURTESY
FRANCIS I. SMITH
503 227 5086

December 18, 1992

VIA FAX NO. (202) 219-3923

Mr. Tony Buckley
Staff Attorney
Federal Election Commission
Washington, DC 20463

RE: MUR 3524, Oregon Republican Party and Bert Farrish, as
Treasurer

Dear Mr. Buckley:

Thank you for the courtesies which you extended to me by
telephone on December 18, 1992. By this letter, we are request-
ing pre-probable cause conciliation in connection with the above
matter.

We have been in contact with the Chairman of the Oregon
Republican Party regarding the question raised by you, namely
whether the Republican National Committee or the Republican
National Senatorial Committee entered into any agreement with the
Oregon Republican Party under which expenditures in support of
the general election of Senator Robert Packwood would be made by
the Republican National Committee or the Republican National
Senatorial Committee. No such agreement exists. In addition, at
the time when the expenditures were made by the Oregon Republican
Party, no expenditures of any kind had been made in support of
the general or primary elections of Senator Robert Packwood by
either the Republican National Committee or the Republican
National Senatorial Committee. Also, the Oregon Republican
Party had no knowledge of any plans of the Republican National
Committee or the Republican National Senatorial Committee to
expend any funds in support of Senator Packwood.

We also would like you to be advised of the role which
Treasurer Bert Farrish has played in this matter. Mr. Farrish is
not an attorney and does not have experience in financial matters
involving political parties or campaigns. He was asked to serve
as the Treasurer of the Oregon Republican Party. He was
flattered by the offer and accepted. In the spring of 1992, he
attended a class sponsored by the Federal Election Commission
relating to the methods of reporting contributions and expendi-
tures. The method of his reporting of the expenditures involved
in this matter to the Federal Election Commission was Mr.
Farrish's best effort to find the appropriate category for the

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Mr. Tony Buckley
Staff Attorney
Federal Election Commission
December 18, 1992
Page 2

type of expenditure involved. Because no coordination of the activity took place with the office of Senator Robert Packwood, and because Mr. Farrish was not aware of Advisory Opinion 1984-15, he had no reason to believe that the expenditures could have been characterized as coordinated expenditures. The guidance provided by the FEC in the spring of 1992 did not help him on this matter. We will be providing an affidavit signed by Mr. Farrish.

The decision to make the expenditures which are involved in this matter was made by the Chairman of the Oregon Republican Party. Mr. Farrish took no part in the decision making, and learned of the expenditures after they had been made.

New leadership of the Oregon Republican Party will be elected within the first 16 days of January of 1993. Therefore, it is very important that we attempt to resolve this matter immediately.

Thanks again for your assistance.

Sincerely,

Mark W. Eves
dmm

Mark W. Eves

MWE:dmm
cc: Oregon Republican Party
Mr. Bert Farrish
Regular mail

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ATTACHMENT 8

Affidavit of Bert Farrish Dated December 22, 1992

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AFFIDAVIT

STATE OF OREGON)
) ss.
COUNTY OF MULTNOMAH)

The undersigned, Bert Farrish, being of lawful age hereby swears and says:

(1) My name is Bert Farrish and I am of lawful age and the elected Treasurer of the Oregon Republican Party.

(2) I have direct knowledge regarding the radio and newspaper advertisements which were purchased by the Oregon Republican Party in 1992 prior to the primary election concerning the activities of Representative Les AuCoin in connection with his conduct concerning the House Bank.

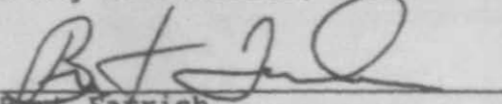
(3) I am not an attorney and I do not have experience in financial matters involving political parties and campaigns. However, in the Spring of 1992, I attended a class sponsored by the Federal Election Commission so that I could learn the methods of reporting contributions and expenditures.

(4) The decision to make the expenditures for the above radio and newspaper advertisements was made by the Chairman of the Oregon Republican Party. I took no part in the decision making, and I learned of the expenditures after they were made. When I learned of the expenditures, I was aware of no other expenditures made by the Republican National Committee or the Republican National Senatorial Committee in support of the general or primary elections of Senator Robert Packwood. I also knew of no plans on the part of the Republican National Committee or the Republican National Senatorial Committee to expend funds in support of Senator Robert Packwood.

(5) The method which I used to report the above expenditures by the Oregon Republican Party was my best effort to find an appropriate category for the type of expenditures involved. Because no coordination of the activity took place with the office of Senator Robert Packwood, I had no reason to believe that the expenditures could have been characterized by anyone as being expenditures coordinated with anyone else. The guidance provided by the Federal Election Commission in the spring of 1992 did not lead me to believe that the expenditures involved should have been reported as coordinated expenditures. I was not aware of Advisory Opinion 1984-15 which apparently has been issued by the Federal Election Commission.

(6) I have used my best efforts to report all matters known to me honestly and fully.

Signed and sworn this 22nd day of December, 1992.


Bert Farrish

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STATE OF OREGON)
) ss.
COUNTY OF MULTNOMAH)

On this 22nd day of December, 1992, personally appeared before me the above named Bert Farrish, and acknowledged the foregoing instrument to be his voluntary act and deed.

Deborah Millsap
Notary Public for Oregon
My commission expires: 6/18/93

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ATTACHMENT 9

Certification of the Commission's Actions Taken in MUR 3524

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Oregon Republican Party and) NUR 3524
Bert Farrish, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 1, 1992, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in NUR 3524:

1. Find reason to believe that the Oregon Republican Party and Bert Farrish, as treasurer, violated 2 U.S.C. § 434(b)(5)(B)(iv).
2. Find no reason to believe that Re-Elect Packwood Committee and Geoffrey D. Brown, as treasurer, violated the Act with respect to the issues in this matter.

(continued)

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3. Approve the Factual and Legal Analysis
and the appropriate letters as recommended
in the General Counsel's report dated
October 20, 1992.

Commissioners McDonald, McGarry, Potter, and Thomas
voted affirmatively for the decision; Commissioners
Aikens and Elliott dissented.

Attest:

12-2-92
Date

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

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DAVIS WRIGHT TREMAINE

LAW OFFICES

2300 FIRST INTERSTATE TOWER • 1300 SW FIFTH AVENUE • PORTLAND, OR 97201-5682
(503) 241-2300 • FAX: (503) 778-5299

STEVEN R. RINKLE
Member Oregon and Hawaii State Bars
Direct Dial: (503) 778-5421

October 25, 1995

VIA UPS OVERNIGHT EXPRESS

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

Re: MUR 4258; MUR 4262; MUR 4265

Dear Sir or Madam:

I represent the Oregon Republican Party ("Respondent") with respect to the three above-referenced matters under review. Enclosed please find the following:

1. Respondent's Response to MUR 4258, including Exhibits 1 and 2;
2. Respondent's Response to MUR 4262, including Exhibits 1, 2 and 3. The Affidavit of Craig Berkman with accompanying exhibits referenced in the Response will be forwarded to you under separate cover;
3. Respondent's Response to MUR 4265, including copies of items 1 and 2 above; and
4. A copy of the Designation of Counsel Form for MUR 4265, signed by Randy Miller, Chairman of the Oregon Republican Party, and faxed to me (executed Designation of Counsel Forms for MUR 4258 and MUR 4262 were previously submitted to you under separate cover). A signed original will be forwarded to you under separate cover.

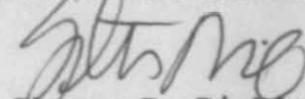
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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 26 11 26 AM '95

Federal Elections Commission
Office of the General Counsel
October 25, 1995
Page 2

Please direct all notifications and other communications
from the Commission regarding the above to me.

Very truly yours,

DAVIS WRIGHT TREMAINE



Steven R. Rinkle

Enclosures

cc: Oregon Republican Party

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BEFORE THE
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 25 11 26 AM '95

THE CENTER FOR RESPONSIVE POLITICS,))
Complainant,))

MUR 4258

v.))

NATIONAL REPUBLICAN SENATORIAL))
COMMITTEE, OREGON REPUBLICAN))
PARTY))

RESPONSE OF RESPONDENT)
OREGON REPUBLICAN PARTY)

Respondents.))

RESPONSE OF RESPONDENT OREGON REPUBLICAN PARTY

1. INTRODUCTION

This response is submitted on behalf of the Oregon Republican Party ("Respondent") and Barton Delacy as Treasurer, in reply to the Complaint filed on September 15, 1995, by the Center for Responsive Politics and designated Matter Under Review 4258. For the reasons stated herein, the Federal Election Commission (the "Commission") should either dismiss the complaint as having already been thoroughly considered and conciliated by the Commission and Respondent in MUR 3524, or find no reason to believe that Respondent violated any provision of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq. (the "Act").

2. THE COMPLAINT

The Complaint alleges "on information and belief" that the National Republican Senatorial Committee ("NRSC") and the Oregon Republican Party ("Respondent") violated the Act, by making coordinated expenditures on behalf of the reelection campaign of Senator Robert Packwood in excess of the limits provided by the Act.

The allegations contained in the Complaint have been investigated by the Commission pursuant to a previously filed complaint, reference number MUR 3524, filed by the Democratic Senatorial Campaign Committee ("DSCC"). Respondent disputed the allegations contained in MUR 3254. Nevertheless, Respondent elected to enter into a conciliation agreement with the Commission

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(the "Conciliation Agreement") disposing of MUR 3254. A copy of the Conciliation Agreement is attached as Exhibit 1. The terms of the Conciliation Agreement were publicly announced by the DSCC through a press release dated September 28, 1993. A copy of the press release is attached as Exhibit 2.

3. THE CONCILIATION AGREEMENT

On May 15, 1992, the DSCC filed a complaint with the Commission (MUR 3524) alleging that, in connection with the reelection of Senator Robert Packwood, Respondent disregarded the legal expenditure limits of the Act by failing to report expenditures for certain advertisements attacking Les AuCoin (the "AuCoin advertisements"). At the time that the advertisements occurred, Les AuCoin was one of the Democratic candidates running in the Democratic primary for the U.S. Senate seat held by Senator Packwood. The DSCC maintained that such expenditures should have been reported as coordinated expenditures.

Respondent maintained that the expenditures for the advertisements should be reported as "operating expenses" not subject to any limits. The advertisements did not advocate the reelection of Senator Packwood, and occurred prior to the general election at a time when the Democratic party nominee had not been selected. The Commission disagreed, and maintained such expenditures should be reported as coordinated expenses.

Respondent subsequently elected to enter into a conciliation agreement (the "Conciliation Agreement") with the Commission. The Conciliation Agreement provides that Respondent failed to properly report costs of more than \$55,000 associated with radio and television advertisements. Under the Conciliation Agreement, Respondent agreed to: (1) pay a civil penalty of \$10,000, consisting of a \$1,000 initial payment and nine consecutive monthly installment payments of \$10,000 each; and (2) amend its reports on file with the Commission to report all expenditures for radio and television advertisements as expenditures governed by 2 U.S.C. § 441a(d). Respondent has paid the \$10,000 civil penalty in full, has amended its reports on file as directed by the Commission, and fully complied with all other terms of the Conciliation Agreement.

4. ANALYSIS

The violations of law alleged in the Complaint concern the same matters addressed and resolved by the Commission under the Conciliation Agreement. Specifically, the Complaint, in Exhibits

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4 and 5, seeks to use the very amended reports prepared and filed by Respondent, as directed by the Commission and required under the Conciliation Agreement, as evidence of violations of the Act in MUR 4258.

Respondent does not wish to recontest the findings of the Commission that the AuCoin advertisements were coordinated expenditures that should have been allocated to the coordinated limit for Senator Packwood's reelection campaign. Respondent does however oppose any attempt to reopen the matters conciliated under MUR 3524.

Finally, Respondent maintains that reopening the matters conciliated in MUR 3524 is a breach the Conciliation Agreement. Specifically, paragraph X, page 8 of the Conciliation Agreement provides that:

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

Further, the Conciliation Agreement was a settlement of disputed claims by the Commission and Respondent, which Respondent entered into to permanently resolve all claims of wrongdoing in connection with the expenditures at issue in MUR 3524. To reopen such matters would damage Respondent, and have broad implications far beyond MUR 4258, including calling into question the efficacy of all future conciliation agreements and the good faith of the Commission.

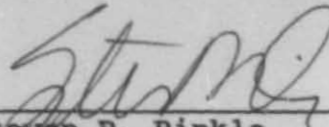
5. RELIEF

Respondent respectfully urges the Commission to do the following:

- a. Dismiss the Complaint as having already been thoroughly considered and conciliated by the Commission;
- b. Declare that Respondent has previously entered into a Conciliation Agreement with the Commission discharging all of the violations of law alleged in the Complaint; and
- c. Declare that Respondent has fully complied with the terms of the Conciliation Agreement and has

discharged all of its obligations under the
Conciliation Agreement.

Respectfully submitted,



Steven R. Rinkle
DAVIS WRIGHT TREMAINE
2300 First Interstate Tower
1300 S.W. Fifth Avenue
Portland, Oregon 97201
(503) 241-2300
Legal Counsel to Oregon Republican Party

Dated: October 25, 1995

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EXHIBIT 1

97043791124

EXHIBIT 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Oregon Republican Party and
Craig C. Brenton, treasurer

)
)
) MUR 3524
)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Democratic Senatorial Campaign Committee. The Federal Election Commission ("Commission") found reason to believe that the Oregon Republican Party and its then-treasurer, Bert Farrish, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(6)(B)(iv) and 441b(a); and 11 C.F.R. § 102.5(a)(1)(i).

NOW, THEREFORE, the Commission and the Oregon Republican Party and its current treasurer, Craig C. Brenton ("Respondents"), having participated in informal methods of conciliation, prior to findings of probable cause to believe, do hereby agree as follows:

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

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

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

IV. The pertinent facts in this matter are as follows:

1. The Oregon Republican Party is a State committee within the meaning of 2 U.S.C. § 431(15).

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2. Craig C. Brenton is the treasurer of the Oregon Republican Party. Neither Craig C. Brenton nor any other current officer of the Oregon Republican Party was an officer of the Party at the time the events which are the subject of this agreement took place.

3. Senator Robert Packwood was the presumptive candidate of the Oregon Republican Party for the 1992 Oregon general election for the U.S. Senate at the time of the events in this matter.

4. At the time of the events in this matter, Representative Les AuCoin and businessman Harry Lonsdale were running in the Democratic primary election to be that party's U.S. Senate candidate in the 1992 Oregon general election.

5. Robeson Marketing Communications is an unincorporated business which provided services relating to the production and placement of the newspaper and radio ads which are the subject of this matter.

6. Pursuant to 2 U.S.C. § 441a(d)(3), a State committee of a political party may not make any expenditure in connection with the general election campaign of any candidate for the office of Senator who is affiliated with that party, which exceeds the greater of two cents multiplied by the voting age population of the State, or \$20,000. For the 1992 election cycle, the State committee in Oregon was allowed to spend up to \$120,091.76 on such expenditures for its candidate. See FEC Record, Volume 16, Number 3 (March 1992).

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FROM DSCC COMMUNICATIONS

-3-

7. A State committee such as the Party must report such expenditures, known as coordinated campaign expenditures, separately. See 11 C.F.R. § 104.3(b)(1)(viii). A party does not have to consult or coordinate with the candidate for a coordinated campaign expenditure to occur. See Advisory Opinion 1984-15.

8. In reporting coordinated campaign expenditures, a committee must include the name of the person receiving such expenditures; the date, amount and purpose of such expenditures; and the name of, and office sought by, the candidate on whose behalf the expenditure is made. See 2 U.S.C. § 434(b)(6)(B)(iv).

9. A communication is considered to be "in connection with a general election," and thus a coordinated campaign expenditure, where it both depicts a clearly identified candidate and conveys an electioneering message. See Advisory Opinion 1984-15.

10. Every report filed by a committee shall disclose the identification of every person who makes a contribution when that contribution is in excess of \$200 within the calendar year, together with the date and amount of any such contribution. See 2 U.S.C. § 434(b)(3)(A). The term contribution includes the provision of any service at a charge that is less than the usual and normal charge. See 11 C.F.R. § 100.7(a)(1)(iii)(A). If a service is provided at less than the usual and normal charge, the amount of the contribution is the difference between the usual and normal charge for the service at the time of the contribution and the amount charged to the political committee. Id.

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11. Pursuant to 2 U.S.C. § 441b(a), it is unlawful to use corporate or labor union monies in connection with a federal election. Oregon law allows a state political committee to accept contributions from corporations and labor unions.

12. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), a political committee must establish a separate federal account, and must make all disbursements, contributions, expenditures and transfers in connection with a federal election from this account.

13. On March 26 and 29, 1992, the Oregon Republican Party, without consulting or coordinating with Senator Packwood, ran a newspaper ad in The Oregonian which criticized Representative AuCoin for bouncing checks at the bank at the U.S. House of Representatives. The ad clearly identified Representative AuCoin, and suggested that, because of his involvement with the House Bank, he was out of touch with the voters of Oregon. As a result, the newspaper ad sought to diminish Representative AuCoin's support in the primary election. The cost of production and placement of this ad totalled \$12,409.48.

14. In the week preceding the May 19th primary election, the Oregon Republican Party, without consulting or coordinating with Senator Packwood, broadcast a radio ad which also criticized Representative AuCoin for bouncing checks at the House Bank. The radio ad clearly identified Representative AuCoin, and suggested that he was lying to the voters of Oregon regarding his involvement with the House Bank. The Oregon Republican Party spent \$42,886.09 on the production and broadcast of this ad.

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Associated Press Library
FROM DSCC COMMUNICATIONS

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PAGE.008

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15. The newspaper and radio ads were intended to help Senator Packwood in the general election either by helping to defeat Representative AuCoin in the Democratic primary election and enabling Senator Packwood to face a perceived weaker candidate in the general election, or helping to weaken Les AuCoin for the general election contest against Senator Packwood.

16. Costs associated with the radio and newspaper ads were coordinated campaign expenditures by the Oregon Republican Party on behalf of Senator Robert Packwood.

17. Respondents did not identify costs associated with the ads as being made to advance Senator Packwood's general election effort; rather, Respondents reported most of these costs generically as "Other Federal Operating Expenditures."

18. The Oregon Republican Party pre-paid Robeson Marketing Communications \$9,991.73 for the media placements for the newspaper ad. The first of two invoices for the newspaper ad totaled \$292.80 more than the Party had pre-paid. Robeson forgave the \$292.80 rather than requiring payment by the Party.

19. Respondents did not report this in-kind contribution by Robeson Marketing Communications.

20. The Oregon Republican Party pre-paid Robeson Marketing Communications \$43,334.00 for the remaining fees and expenses for the newspaper ad and for all fees and expenses relating to the radio ads. When the actual bill came to more than \$45,000, Robeson drew upon funds previously paid to it from the Oregon Republican Party's non-federal account for payment of the balance of approximately \$1,670.

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21. The Oregon Republican Party contends that Robeson applied the funds previously paid from the party's non-federal account without the consent of the Party. However, until notified of an apparent violation by Commission staff some seven months later, the Party did not seek reimbursement of any of the amounts applied from its non-federal account and did not begin its efforts to satisfy the remainder of the bill with clean funds from its federal account.

V. 1. Respondents failed to properly report costs of more than \$55,000 associated with the radio and newspaper ads critical of Les AuCoin, in violation of 2 U.S.C. § 434(b)(6)(B)(iv).

2. Respondents failed to report receipt of an in-kind contribution from Robeson Marketing Communications, in violation of 2 U.S.C. § 434(b)(3)(A).

3. Respondents used funds prohibited by the Act to pay part of the costs at issue in this matter, in violation of 2 U.S.C. § 461b(a) and 11 C.F.R. § 102.5(a)(1)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Ten Thousand dollars (\$10,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$1,000 due sixty days from the effective date of this agreement;

2. Thereafter, nine consecutive monthly installment payments of \$1,000 each;

3. Each such installment shall be paid thirty days from the date of the previous installment;

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4. In the event that any installment payment is not received by the Commission within five days of the date it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

5. Respondents will amend their reports on file with the Commission to accurately report all the expenditures (including the in-kind contribution) for the radio and television ads as Section 441a(d) expenditures.

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

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the

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requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

L. G. Gerner
Lois G. Gerner
Associate General Counsel

September 24, 1993
Date

FOR THE RESPONDENTS:

Craig Branton
(Name)
(Position) Treasurer

July 22, 1993
Date

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EXHIBIT 2

97043791133



EXHIBIT 2

Democratic Senatorial Campaign Committee

430 South Capitol Street, S.E., Washington, D.C. 20003 • (202) 774-7447

September 28, 1993

Contact: Kim James
202/485-3123

Chairman

Bob Graham, FL

Ex-Officio

George Mitchell, ME

Program Chairs

John D. Rockefeller IV, WV
Richard Shelby, AL
Majority Trust

Chris Dodd, CT
Max Baucus, MT
Leadership Circle

David Pryor, AR
Patty Murray, WA
Business Roundtable

Tom Harkin, IA
Ben Nighthorse Campbell, CO
Labor Council

Barbara Mikulski, MD
Barbara Boxer, CA
Women's Council

Post Chairs

Charles E. Robb, VA
Joni Brauns, LA
John Kerry, MA

Oregon GOP Fined
for Irregularities in '92 Packwood Race

WASHINGTON--The Oregon Republican Party will pay a \$10,000 civil penalty for campaign violations committed on behalf of Senator Bob Packwood's 1992 re-election effort.

The Federal Election Commission (FEC) said the Oregon Republican Party violated federal campaign law by failing to report spending on media attacks against former U.S. Rep. Les AuCoin.

"The Oregon Republican Party made an inordinate effort to intervene in the Democratic primary," said Don Foley, executive director of the Democratic Senatorial Campaign Committee (DSCC), which filed an FEC complaint against the Oregon GOP. "This is the price for stepping over the line."

AuCoin prevailed in the Democratic primary over Harry Lonsdale, and challenged Packwood in the Oregon general election last fall.

"(The Oregon Republican Party) failed to properly report costs of more than \$55,000 associated with the radio and newspaper ads critical of Les AuCoin, a violation of (federal law,)" said a legal agreement signed by the FEC and the Oregon Republican Party.

The state GOP will pay a \$10,000 penalty to the FEC in monthly installments of \$1,000.

Packwood spent \$5.7 million in his 1992 re-election effort.

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(Copy of FEC documents are attached)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)

MAR 5 11 40 AM '97

ENFORCEMENT PRIORITY

SENSITIVE

GENERAL COUNSEL'S REPORT

MAR 11 1997

EXECUTIVE SESSION

I. INTRODUCTION

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing such cases permits the Commission to focus its limited resources on more important cases presently pending before it. Based upon this review, we have identified 25 cases which do

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not warrant further action relative to other pending matters.¹ Attachment 1 to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more remote and consequently more difficult to develop. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community.

¹ These cases are: MUR 4332 (Bill Thomas Campaign Committee); MUR 4347 (Anonymous Respondent); MUR 4354 (Brian Steel for Congress); MUR 4367 (Philipstown Republicans); MUR 4371 (Employment Group); MUR 4373 (Cannon for Congress); MUR 4374 (Mark Stodola for Congress Primary Committee); MUR 4375 (Westchester County Conservative Party); MUR 4377 (Braxton for Congress); MUR 4379 (Teamsters Local Union No. 135); MUR 4383 (Pauken for Congress); MUR 4384 (Willie Colon for U.S. Congress); MUR 4388 (Bill Witt for Senate and Congress); MUR 4390 (Kolbe 96); MUR 4391 (Pat Roberts for Congress Committee); MUR 4393 (Cecil J. Banks); MUR 4397 (AFL-CIO); MUR 4405 (Katz for Congress Committee); MUR 4411 (First Evangelical Presbyterian Church); MUR 4414 (Turietta-Koury for Congress Committee); MUR 4418 (Bell Atlantic); MUR 4421 (Butler for Mayor); MUR 4448 (Friends for Jim Rapp); Pre-MUR 334 (Kinnamon for Congress); and Pre-MUR 335 (Davis for Congress).

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We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale 12 are not worthy of further action, and merit closure.⁴

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective April 1, 1997. Closing these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

⁴ These cases are: MUR 4139 (*Enid 94*); MUR 4150 (*Frank Fasi*); MUR 4257 (*DSCQ*); MUR 4258 (*NRSC*); MUR 4260 (*Packwood & Auto Dealers*); MUR 4261 (*NRA Institute for Legis.*); MUR 4262 (*Oregon Republican Party*); MUR 4265 (*NRSC; Sen. Phil Gramm*); MUR 4272 (*Bishop for Congress*); MUR 4279 (*Russ Berrie Co.*); MUR 4284 (*United We Stand America*); and Pre-MUR 322 (*Royal Hawaiian Country Club*).

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III. RECOMMENDATIONS.

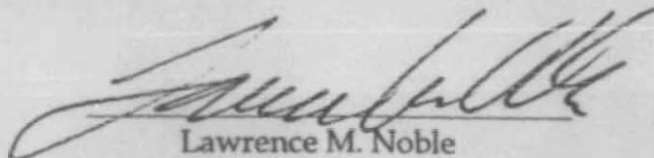
A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322
2. Pre-MUR 334
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4139 | 13. MUR 4347 | 25. MUR 4390 |
| 2. MUR 4150 | 14. MUR 4354 | 26. MUR 4391 |
| 3. MUR 4257 | 15. MUR 4367 | 27. MUR 4393 |
| 4. MUR 4258 | 16. MUR 4371 | 28. MUR 4397 |
| 5. MUR 4260 | 17. MUR 4373 | 29. MUR 4405 |
| 6. MUR 4261 | 18. MUR 4374 | 30. MUR 4411 |
| 7. MUR 4262 | 19. MUR 4375 | 31. MUR 4414 |
| 8. MUR 4265 | 20. MUR 4377 | 32. MUR 4418 |
| 9. MUR 4272 | 21. MUR 4379 | 33. MUR 4421 |
| 10. MUR 4279 | 22. MUR 4383 | 34. MUR 4448 |
| 11. MUR 4284 | 23. MUR 4384 | |
| 12. MUR 4332 | 24. MUR 4388 | |

3/5/97
Date


Lawrence M. Noble
General Counsel

97043791138

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document #X97-16
Enforcement Priority)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matter:

A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322;
2. Pre-Mur 334;
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | |
|--------------|---------------|
| 1. MUR 4139; | 10. MUR 4279; |
| 2. MUR 4150; | 11. MUR 4284; |
| 3. MUR 4257; | 12. MUR 4332; |
| 4. MUR 4258; | 13. MUR 4347; |
| 5. MUR 4260; | 14. MUR 4354; |
| 6. MUR 4261; | 15. MUR 4367; |
| 7. MUR 4262; | 16. MUR 4371; |
| 8. MUR 4265; | 17. MUR 4373; |
| 9. MUR 4272; | 18. MUR 4374; |

(continued)

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Federal Election Commission
Certification: Enforcement Priority
March 11, 1997

Page 2

19. MUR 4375;	27. MUR 4393;
20. MUR 4377;	28. MUR 4397;
21. MUR 4379;	29. MUR 4405;
22. MUR 4383;	30. MUR 4411;
23. MUR 4384;	31. MUR 4414;
24. MUR 4388;	32. MUR 4418;
25. MUR 4390;	33. MUR 4421;
26. MUR 4391;	34. MUR 4448.

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

Attest:

3-12-97
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APR 01 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kent Cooper, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 4258

Dear Mr. Cooper:

On September 15, 1995, the Federal Election Commission received a complaint file by Ellen Miller on behalf of the Center for Responsive Politics alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437(g)(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043791141



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APR 01 1997

Steven R. Rinkle, Esquire
Davis Wright Tremaine Law Offices
1300 SW Fifth Avenue
Portland, OR 97201

RE: MUR 4258
Oregon Republican Party and Barton Delacy, as treasurer

Dear Mr. Rinkle:

On September 20, 1995, the Federal Election Commission notified your clients, Oregon Republican Party and Barton Delacy, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APR 01 1997

Craig M. Engle, General Counsel
National Republican Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

RE: MUR 4258

National Republican Senatorial Committee and Stan Huckaby, as treasurer

Dear Mr. Engle:

On September 30, 1995, the Federal Election Commission notified your clients, the National Republican Senatorial Committee and Stan Huckaby, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4258

DATE FILMED 4-16-97 CAMERA NO. 1

CAMERAMAN Jm N

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