



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4284

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FEDERAL ELECTION COMMISSION

SENSITIVE

United We Stand America-Ohio, Inc.
5500 Market St., Suite 92
Youngstown, Ohio 44512

Complainant,

vs.

H. Ross Perot
12377 Merrit Dr., Dallas, Texas 75251,
Citizens to Establish a Reform Party,
77 E. Wilson Bridge Rd.
Worthington, Ohio 43085, and
United We Stand America, Inc.
7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

Respondents.

MUR 4284

COMPLAINT

INTRODUCTION

1. United We Stand of America-Ohio, Incorporated ("UWSA-OH") is an independent educational, nonprofit, nonpartisan Ohio Corporation concerned with issues of political reform.¹ It seeks to retain its character against present efforts being made by H. Ross Perot and persons on Mr. Perot's payroll to convert its assets, along with the assets of United We Stand America, Inc. (UWSA) a D. C. Corporation, into an adjunct of partisan political activities. The elected board of UWSA-OH represents many dues paying members of UWSA.
2. UWSA-OH files this complaint against the apparently unlawful contributions by H. Ross Perot of Dallas, Texas directly and by UWSA, to those functioning as a political committee with Mr. Perot to influence the 1996 federal elections. In doing so UWSA-OH hopes that it will help protect UWSA-OH's and UWSA's original mission to function as nonpartisan, nonprofit educational organizations. This mission was the basis upon which hundreds of thousands of concerned Americans joined UWSA and paid \$15-20 annual dues, volunteered their time and made in kind contributions. UWSA National Director Russell Verney has admitted that:

¹ See Attachment 1: Articles of Incorporation UWSA-OH

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"More than 83 percent of the respondents to our national survey insisted, if a new party is formed, that UWSA remain as is --- focused on issues and not on promoting individuals."²

3. The partisan activities of Mr. Perot threaten the ability of UWSA to continue to pursue its original mission.

BACKGROUND FACTS

4. In accordance with 11 CFR 111.4 the statements made herein are based upon information and belief and are accompanied by documentation which Complainant is prepared to supplement in order to assist the Commission in making its determinations and conducting its investigations in accordance with law.

5. The purpose of those joining UWSA was as stated in its mission statement: to promote the public interest, rather than any special interest, through nonpartisan reform activity. Most of those contributing money, time and other resources did not do so for the purpose of serving the ambitions of any person for public office, even those of H. Ross Perot.

6. State organizations like UWSA-OH were licensed to use the name UWSA by UWSA, Inc. and incorporated under state laws as nonprofit corporations. Their boards of directors were elected from and by the membership of their respective Congressional districts or counties.

7. A majority of the UWSA national board consists of Mr. Perot and persons on UWSA's payroll. Mr. Perot exercises veto power over volunteers nominated from the states for the National Board. He appoints the National Executive Director.

8. Upon information and belief, sometime prior to or during December of 1994 Ross Perot decided that using the resources of UWSA to create a new political party was the most advantageous route for his 1996 Presidential candidacy. Where Mr. Perot was not able to control the separately incorporated boards, in order to further this endeavor, policies were implemented to undermine the state volunteer leadership structure.³ These included:

a. terminating the payment of any portion of UWSA dues to the volunteer state UWSA organizations, as originally promised,

² See Attachment 2: Mulford Letter and UWSA Newsletter of September 1995

³In December meetings in Dallas of Regional and State UWSA Directors the necessity of disbanding state corporations was openly discussed. The Verney Memorandum entitled "The Start of Year Three for UWSA" dated January 12, 1995 reflected the same intent stated in a less revealing manner. (See Attachment 3).

b. terminating any reporting obligation of the Perot appointed UWSA state executive directors to the elected volunteer state UWSA boards of directors,

c. directing the holding of UWSA meetings to build support for the idea of creating a new political party under the supervision and control of the Perot appointed UWSA State Executive Directors reporting to the national or regional directors reporting to Mr. Perot,⁴ and

d. when the paid Regional Director of Ohio Ralph Perkins and the paid UWSA State Executive Director of Ohio Sandy Reckseit were unable to persuade the duly-elected volunteer board of directors of UWSA-OH to support the creation of a "third" party, they convened a meeting of a "bogus" Board of Directors handpicked by them (including two members of the legitimate board), had this board elect new officers, and declared it to be the new board of UWSA-OH, Inc. This "bogus" board has made public statements offering its support in the formation of the Reform Party.

9. The adverse effect that these policies were having upon the nationwide viability of the elected UWSA state volunteer structures was documented in the "Seattle Report," the outgrowth of a meeting of ten western state UWSA Chairs or their designated representatives (Alaska, California, Hawaii, Idaho, Montana, North Dakota, Oregon, South Dakota, Washington, Wyoming) held on February 7, 1995.⁵

10. In June 1995 Mr. Perot increased the pressure upon the elected volunteer state boards by withdrawing all directors' liability insurance which had previously been provided to the state boards by UWSA, Inc.

11. In taking these actions Mr. Perot has been able to make some of the state organizations, such as Kentucky, Maine, Arkansas and North Carolina, to function as directed by Mr. Perot in the manner that he determined would best support his 1996 run for the presidency of the U.S. In a survey of all the states conducted by UWSA-OH in July-August 1995, two-fifths of the state corporations had been dissolved and many others were considering like action because of these heavy-handed policies, lack of funding and so forth.

12. Assets, including the private membership lists of UWSA in California and Ohio have been transferred to the political party being created by Mr. Perot. The "bogus" UWSA-OH

⁴ Ohio's State Executive Director without prior discussion or approval of Ohio's elected board directed the setting up of town hall meetings to discuss the third party idea by memo dated December 21, 1994. (See Attachment 4).

⁵ See Attachment 5. Even more interesting than the constructive "Seattle Report" is Dave Morgan's letter to Mr. Perot describing Mr. Perot's usual reaction to problems within UWSA reported by the membership.

board formed under the direction of Perot, Perkins and Reckseit attempted to seize the bank account and all the assets of the legitimate corporation.⁶

13. In a meeting of 29 UWSA state volunteer leaders in Las Vegas, Nevada, October 27-29, 1995, the elected Presidents of UWSA-New York, Inc., UWSA-Arizona, Inc., UWSA-Indiana, and elected Chair of UWSA-OH joined with former or current elected UWSA chairs of California, Alaska, Washington, Idaho, and Montana, and 17 other leaders including Arizona's volunteer Executive Director and 10 current or former grassroots elected UWSA Congressional District Coordinators. They symbolically fired Mr. Perot because he had deviated from the stated purposes and stated democratic character of UWSA. Volunteer leaders from 45 of the 50 states surveyed by UWSA-OH wanted the Las Vegas meeting to be held.⁷

14. Much of the good will and resources of UWSA generated by volunteers and small individual contributor/members have been converted to the campaign activities of Mr. Perot in his creation of a party to serve as the vehicle for which many experts believe will be his 1996 candidacy for President of the United States.

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a. Paid Executive Directors and Regional Directors of UWSA from many other states have been brought into the states of California and Ohio and will continue to be moved from state to state to complete the petition or registration efforts of Mr. Perot's "Third Party." For example Ralph Perkins, North Central Regional Director for UWSA, Inc., and a resident of Michigan, filed the name reservation for Mr. Perot's party with the Ohio Secretary of State. Since then, he has been joined in Ohio by David Shaver, UWSA paid Executive Director from Pennsylvania, Claire Geddes, Utah's paid Executive Director of UWSA and Rosemarie Sax, Colorado's paid Executive Director, all operating out of Youngstown, Ohio; Debi Berberich, Wisconsin's paid Executive Director operating out of Cincinnati; Wade Habshey, Indiana's paid Executive Director operating out of Toledo; Don Mott, Virginia's paid Executive Director and Norris Clark, New Jersey's paid Executive Director operating out of Cleveland; and Richard Taylor Georgia's paid Executive Director operating out of Columbus.⁸

b. The UWSA National Executive Director, Russell Verney from Dallas, Texas and his ancillary staff from the national UWSA office have been in Ohio working full time on the petition campaign as well. There were oral reports by UWSA paid personnel that Mr. Perot had imported thirty paid UWSA personnel into Ohio to assist in the petition process. Verney

⁶ See Attachment 6: "Bogus Board Memorandum. When confronted with the illegality of these actions, Regional Director Ralph Perkins' reported response was that the legitimate UWSA-OH board was powerless due to the lack of resources to fight their actions.

⁷ See Attachment 7: *Contra Costa Times*, Nov. 1, 1995.

⁸ See Attachment 8: Request for Name Reservation and UWSA/Reform Party mixing

worked out of the Columbus UWSA office with Regional Director (and Michigan resident) Ralph Perkins, along with Richard Taylor of Georgia (no relation to UWSA-OH Chair Deborah Taylor of Ohio).

c. UWSA private membership lists⁹ and offices have been used for the party petition activities. UWSA former and present members received "Reform Party" petitions in the mail. Automated telephone calls have been made to members of UWSA falsely stating that the board of UWSA-OH unanimously supports Mr. Perot's creation of a new party and asking for their volunteer assistance in the circulation of petitions. This was in direct contradiction of the duly elected UWSA-OH board actions.¹⁰ The message was as follows:

"Hello. This is a United We Stand America Volunteer alert. The UWSA Ohio Board of Directors voted overwhelmingly to support Ross Perot's effort to form a political party in Ohio. The petition turn-in deadline for the Reform Party of Ohio is November 17. Volunteers are urgently needed to help obtain petition signatures . . ."

d. The UWSA name has also been used in public announcements and staged news pictures in support of the "Reform Party" in California.¹¹

e. The names of the Committee for the filing of the petition of the Ohio Reform Party consist of the paid UWSA Executive Director for Ohio Sandy Reckseit and her husband David as well as Rosalyn (Lynn) Williams whose sister is the paid UWSA Executive Director for Florida Pat Muth. Robert and Mildred Fischer are the parents of Debi Berberich, the paid UWSA Executive Director for Wisconsin.¹²

f. The national office of UWSA is working primarily on the formation of the Independence/Reform Party, thus ignoring the reform objectives of the original UWSA mission.

15. Ross Perot has repeated the same pattern of asking people to join him in a relationship in which he would serve them and their wishes ("I'm Ross and you're the boss.") followed by his taking unilateral action that subordinates their interests and desires to his own. It is clear after analyzing the methods by which this new party is being formed, that rather than standing for either "independence" or "reform" as the name advertises, it is intentionally designed to function in accordance with dictates of Ross Perot, just as has been UWSA. This is assured

⁹ See Attachment 9 from UWSA National Newsletter, October 1995.

¹⁰ See Attachment 10: two UWSA-OH press releases October 24 and November 9, 1995.

¹¹ See Attachment 11: *USA Today*, October 9, 1995.

¹² See Attachment 12: Petition to Form a Political Party.

by having all its real leaders either directly on Mr. Perot's payroll or, through close family connections, indirectly financially interested in the continued approval and largess of Ross Perot.

16. An Internet report dated November 11, 1995 posted by Skip Leuschner, quoted page 27 of *The Oregonian*, an article entitled "Perot Says Reform Party Will Skip California Primary." This article stated that, after a three-week \$700,000 campaign to qualify the Reform Party to the California ballot, Mr. Perot announced at the San Francisco Commonwealth Club that there will not be a candidate in the March 8 primary of California. Mr. Perot reportedly stated that his party would wait for a better idea of who was running, then would have a convention Labor Day weekend, with satellite feed to auditoriums across the country to choose their 1996 presidential candidate. This is further evidence of Mr. Perot's intention to be the Reform Party candidate and control the activities of the Reform Party unilaterally, for:

a. Only a flawed candidate with unlimited financial resources could benefit from commencing a campaign that close to the general election. A legitimate candidate would want the advantage of winning a primary and participating in a full campaign process from the spring to the fall of 1996.

b. If the Reform Party was to be the party of its members, it would be impossible for Ross Perot to know as early as November 11, 1995 that the more than 120,000 people in the party had already decided not to run primary candidates.

17. An Internet Report by Char Roberts of UWSA in California dated November 16, 1995 announced that sufficient signatures had been obtained in Ohio and that Richard Taylor had been designated the Ohio Coordinator for "Ohio Citizens to Establish a Reform Party." Richard Taylor is the Perot paid Executive Director of UWSA for Georgia (and, again, no relation to UWSA-OH Chair Deborah Taylor).

18. Pursuant to Ohio Revised Code Sec. 3517.02 members of a controlling committee of a minor party are determined in accordance with party rules. A minor political party, including new parties formed by petition, may elect its controlling committee at a primary election by filing a plan for party organization on or before the ninetieth day before the primary election or choose it in accordance with party rules. Contrary to the assurances from Ross Perot that the new party will belong to those who join it, Perot will, through his control over the new party hierarchy, dictate, without consultation with the signers of the petitions, all significant matters for the party including that there be no primary election for the Reform Party of Ohio, due to the intention that Mr. Perot be selected as the presidential candidate at the Labor Day weekend electronic convention.

19. Ross Perot's tactics in purporting to engage in nonpartisan or democratic activity subservient to the interests of others have been designed to:

a. recruit volunteers and contributors to advance Mr. Perot's credibility with the promise that such contributors and volunteers will have any ownership, control or meaningful voice,¹³

b. obtain favorable financial and tax considerations for the conduct of his political operations, including avoiding, where possible, the disclosure requirements, limitations and prohibitions of federal law relating to the activities of a political committee,

c. use the appearance of non-partisanship to obtain solicitations of support, endorsements and cooperation from unwary citizens, major party leaders, legitimate reform organizations and others, and

d. delay for as long possible the disclosure, and therefore maintain the advantage of surprise, of his plan to spend, for all practical purposes, an unlimited amount of money for political advertising preceding the November 1996 presidential election in support of his candidacy for that office.

VIOLATIONS OF THE FEDERAL ELECTION ACT

20. Ross Perot stated in his September 17, 1995 announcement on the Larry King Live Show of his creation of a new party that its purpose was to run only a candidate for President of the United States in 1996 and seek to influence the elections of Congressional candidates. He reiterated, in an appearance on the Ohio State University Radio Fred Anderle Show of November 15, 1995, the federal election focus of his effort:

"It will belong to the people who create the party. It will not belong to the special interests. We will not take a penny of special interest money. Our presidential candidate's campaign will be funded by millions of small donations. In addition, we will study carefully the candidates for every seat in the House and Senate where candidates are running in 1996. We will identify the candidate that is committed to these reforms that are necessary. We will get a written commitment from that candidate that he or she is committed to these reforms. Then, we, in a highly organized way, since we are now organized into a party, can mobilize a majority of the vote to back those Congressional and Senatorial candidates and our presidential candidate. Then in 1997, where certainly we will have provided the vote to get virtually all of the House and Senate candidates into office, because it will be the swing vote, can

¹³ Mr. Perot as Chairman of the UWSA National Board has failed to call a national board meeting since the mid year 1995 election of the board. Furthermore he has failed to provide either a financial accounting to the membership or even the results of the national board elections in June 1995.

provide the vote to get our presidential candidate elected, instead of having train wrecks and cat fights, we will have a united team working night and day to solve our country's problems in a rational, thoughtful, careful way."

Based on those statements by Mr. Perot, an individual exercising the apparent ability to control UWSA and Citizens to Establish a Reform Party, and the objective to influence solely federal elections, the Federal Election Act requires that contributions made and accepted be subject to the limitations and prohibitions of the Act.

21. Those organizing with Ross Perot the party announced by Ross Perot for the purposes stated by him are a political committee within the meaning of 2 U.S.C. Sec. 431(4) (A) inasmuch as they have received contributions in excess of \$1000 or made expenditures in excess of \$1000 during the calendar year.

22. The political committee organized and directed by Ross Perot has knowingly received contributions as defined in 2 U.S.C. Sec. 431(8) (A) from single sources in excess of the \$5,000 permitted by the Federal Election Act, particularly 2 U.S.C. Sec. 441 (a) (1) (C), both in Ohio and California.

CONCLUSION

23. Mr. Perot's activities, personally and through the various entities he controls, clearly violate the letter and intent of the Federal Election laws intended to prevent the exercise of undue political influence based upon wealth. These activities demonstrate an intention to exploit the present vulnerability of the American political system arising out of the acceptability of political advertising as a means of campaigning for political office and the absence of any legal restriction upon the use of a candidate's personal wealth to promote his or her own candidacy through the use of such commercial advertising. While the federal election laws and Supreme Court precedents do not foreclose this possibility, enforcement of the limits upon the amount of contributions from a single source, can inhibit somewhat the surreptitious and deceptive character of the tactics being utilized to form this "third party."

24. The current violations of Federal Election Laws are an integral part of a much broader plan by Ross Perot and persons on his payroll to capture the Presidency of the United States in 1996. The overriding public interest that fraudulent and deceptive means not be successfully employed in such an effort, makes it essential that the Commission promptly enforce the law to the full extent of its jurisdiction and fully inform the public.

WHEREFORE, the Commission should expedite its investigation, make appropriate findings and issue appropriate orders and sanctions in this matter.

Respectfully submitted,

United We Stand America-Ohio, Inc.¹⁴

By Deborah N. Taylor
Deborah Taylor

Its Chairperson

5500 Market St., Suite 92

Youngstown, Ohio 44512

(216) 788-6508

Fax (216) 788-0645

By M. Anne Saucier
M. Anne Saucier

Its Secretary

5318 N. High St.,

Columbus, Ohio 43214

(614) 848-9484

Fax (614) 442-0469

By Clifford O. Arnebeck, Jr.
Clifford O. Arnebeck, Jr.

Its Attorney

ARNEBECK & CHRISTENSEN

65 E. State St., Suite 1000

Columbus, Ohio 43215

(614) 460-3524

Fax (614) 481-7511

¹⁴ This document is being signed in separate counterparts and sent by facsimile to be followed by originals in the mail.

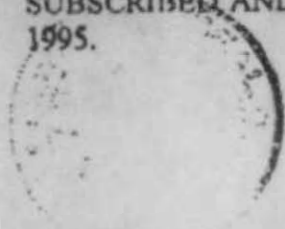
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County of Mahoning)

) ss.

State of Ohio)

SUBSCRIBED AND SWORN to before me by Deborah Taylor this 20th day of November 1995.



Launie Hughes
Notary Public

County of Franklin)

) ss.

State of Ohio)

SUBSCRIBED AND SWORN to before me by M. Anne Saucier this 20th day of November 1995.



CONNIE LINDBLOM
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires Nov. 23, 1998

Connie Lindblom
Notary Public

County of Franklin)

) ss.

State of Ohio)

SUBSCRIBED AND SWORN to before me by Clifford O. Arnebeck, Jr. this 20th day of November 1995.



CONNIE LINDBLOM
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires Nov. 23, 1998

Connie Lindblom
Notary Public

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ATTACHMENTS

1. Articles of Incorporation of UWSA-OH
2. Mulford "To Whom it May Concern" re status of UWSA and UWSA Newsletter of September 1995
3. Verney Memo Jan. 12, 1995
4. Rechseit Memo Dec. 21, 1994
5. "Seattle Report" and Dave Morgan Letter re reaction to "Seattle Report"
6. Summary of the Ohio "Bogus" Board Mtg.
7. News Article re Las "Vegas Meeting of the States" *Contra Costa Times* 11/1/95
8. Name Reservation for Independence/Reform Ohio Party and UWSA/Reform Party Intermingling
9. A newsletter of UWSA, Inc. re the privacy of membership lists
10. Press Releases of UWSA-OH dated Oct. 24 & Nov. 9, 1995
11. *USA Today* Oct. 9, 1995 re California petition, page 8A
12. Ohio Reform Party Petition Controlling Cmte.

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The State of Ohio

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Bob Taft
Secretary of State

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Certificate

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It is hereby certified that the Secretary of State of Ohio has custody of the Records of Incorporation and Miscellaneous

Filings; that said records show the filing and recording of: ARN

of:

UNITED WE STAND AMERICA - OHIO, A NON-PROFIT CORPORATION

United States of America
State of Ohio
Office of the Secretary of State

Recorded on Roll 9412 at Frame 0312 of
the Records of Incorporation and Miscellaneous Filings.

Witness my hand and the seal of the Secretary of State at
Columbus, Ohio, this 11TH day of JAN
A.D. 19 94 .



Bob Taft
Bob Taft
Secretary of State

09418-0312

Approved PMC
Date 1-11-94
Fee 25.00

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ARTICLES OF INCORPORATION

(Under Chapter 1702 of the Ohio Revised Code)
Non-Profit Corporation

The undersigned, desiring to form a corporation, not for profit, under Sections 1702.01 et seq. of the Ohio Revised Code, do hereby state the following:

FIRST. The name of said corporation shall be United We Stand America - Ohio, a non-profit corporation.

SECOND. The place in Ohio where its principal office is to be located is City of Columbus, Franklin County, Ohio.

THIRD. The purpose for which this corporation is organized is as a non-profit corporation to involve citizens in government and in public policy decision making; to conduct research and to disseminate information on public policy issues; to serve as a advocate before the public and before government officials and before government bodies on public policy issues; and to conduct other related activities. The corporation is organized exclusively for the promotion of social welfare within the meaning of section 501(c)(4) of the Internal Revenue Code of 1986, as amended. The corporation will attempt to qualify and remain recognized as a affiliate of United We Stand America, Inc., a District of Columbia non-profit corporation. Such qualification, recognition, affiliation and other activities of the corporation will not render it an agent of any organization, including United We Stand America, Inc.

(2) The general purposes and powers are to have and exercise all rights and powers conferred on non-profit corporations under the laws of Ohio, or that may be conferred, including the power to contract, rent, buy, or sell personal or real property. However, this corporation shall not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the primary purpose of this corporation.

(3) Notwithstanding any of the above statements of purposes and powers, this corporation shall not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the primary purpose of this corporation.

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FOURTH. The following persons, not less than three, shall serve said corporation as trustees until the first annual meeting or other meeting called to elect trustees.

Barry Kephart Cincinnati	2692 Stratford Ave. #3 Ohio 45212
Al Montag Cincinnati	1214 Neale Rd. Ohio 45104
Robert F. Christy Dayton	622 Watervliet Ave. Ohio 45420
Don Boothby Lima	908 East Kibby Street Ohio 45804
Michael Torok Bradner	11101 Pemberville Rd. Ohio 43406
Ray Mathias Athens	3975 Campbell Rd. Ohio 45701
Bob Stavor Springfield	1735 Longview Dr. Ohio 45504
Mike Swanger Middletown	1001 Midway St. Ohio 45042
Eric Novin Curtice	9120 Brown Rd. Ohio 43412
Ed Stanek Strongsville	17067 Raccoon Trail Ohio 44136
Maurice Perkins Cleveland	3255 E. 134th St. Ohio 44120
John Ressler Westerville	3560 Carthage Ct. Ohio 43081
Nelson Bernauer Hinckley	2474 Laurel Rd. Ohio 44233
Eddie Plotts	45 Meadowridge Rd.

Mogadore

Ohio 44260

09412-0314

Sandra Recksiet
Worthington

2694 McVey Blvd. West
Ohio 43235

Paul Gebhardt
Millersburg

388 S. Clay St.
Ohio 44654

Debbie Taylor
Youngstown

43 Withers Dr.
Ohio 44512

Cindy Davitt
Coshocton

1003 Cambridge Rd.
Ohio 43812

Karen Richards
Concord

8335 Eagle Ridge Dr.
Ohio 44077

IN WITNESS WHEREOF, we have hereunto subscribed our names, this 11 day of
JANUARY, 19 94.

By: [Signature], Incorporator
Vollney B. Corn, Jr.

By: [Signature], Incorporator
John Ressler

By: [Signature], Incorporator
C. H. Bendig

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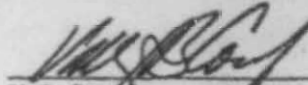
ORIGINAL APPOINTMENT OF STATUTORY AGENT

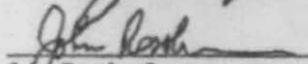
The undersigned, being at least a majority of the incorporators of United We Stand America - Ohio a non-profit corporation hereby appoint Charles H. Bendig to be statutory agent upon whom any process, notice or demand required or permitted by statute to be served upon the corporation may be served. The complete address of the agent is:

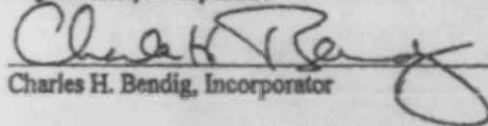
4937 West Broad Street

Columbus, Ohio 43228

NOTE: P. O. Box addresses are not acceptable for cities with populations over 2,000.


V. B. Corn, Incorporator


John Ressler, Incorporator


Charles H. Bendig, Incorporator

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C

United We Stand America, Inc.

7616 LBJ Freeway, Suite 727
Dallas, Texas 75251
Telephone (214) 450-8800

Russ Clayton Mulford
General Counsel

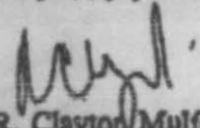
January 25, 1993

To Whom it May Concern:

United We Stand America, Inc. has been organized as a nonprofit corporation under the District of Columbia Nonprofit Corporation Act to operate on a nonprofit basis for the promotion of social welfare, including specifically to educate and inform the public on subjects intended to benefit the community and nation, to conduct research and to involve citizens in government and government decision making, to disseminate information regarding public policy issues, to serve as an advocate before the public on public policy issues and to conduct other related educational and social welfare activities.

United We Stand America, Inc. has applied for 501(c)(4) tax exempt status with the Internal Revenue Service and at this time has not received a determination by the IRS as to tax exempt status.

Very truly yours,


R. Clayton Mulford
General Counsel

RCM/mk

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REVITALIZING EDUCATION BEGINS AT THE LOCAL LEVEL

By DEBI BERBERICH

Participants in the Revitalizing Education workshops came prepared with informative statements for the group rather than questions of the panel.

Many emphasized the teacher-student-parent relationship as most effective to the overall education of the child, as well as the need for education to be a lifetime process — beginning at infancy and continuing throughout adulthood.

Participants disagreed with the concept of a "one-size-fits-all" education; they said education must be focused on the individual student and not limited to a set of techniques or one philosophy.

"There is growing reason to believe the education reform movement of recent administrations involves the set up of a new national bureaucracy designed to affect instruction of political correctness," said panelist Joel O'Connor of the UWSA national Task Force on Education. "A result to date appears to be the 'dumbing down' of today's students."

Recommendations from participants included returning decision-making to the teacher as the most effective means of educating students, reducing the administrative levels and bureaucratic agencies which are costly and ineffective, promoting school choice, and including citizenship as part of the curriculum.

"The restoration of local control and parental choice are among the many actions we must discuss and take to revitalize education in America," O'Connor said. "This is another UWSA wake-up call!"

NEW POLITICAL FORCE: KEEP ALL OPTIONS OPEN

By RUSSELL J. VERNEY

Throughout the year United We Stand America members have sponsored hundreds of local meetings, completed numerous surveys, and participated in the "Third Political Force" workshop at the National Conference. The stimulus for all this activity has been a growing frustration with "business as usual" and the lack of accomplishment from our elected officials.

Some UWSA members have determined that the only effective way of bringing about the desired performance from elected officials is to focus their energy and resources on creating the infrastructure of a new political party in their state, followed by a search for candidates, raising the money to enable their candidates to be competitive, and ultimately electing a sufficient number of representatives of the new party to the House and Senate to be able to influence the outcome of economic and government reform measures.

More than 83 percent of the respondents to our national survey insisted, if a new party is formed, that UWSA remain as is — focused on issues and not on promoting individuals.

At the workshop sessions during the National Conference, UWSA members from across the country suggested unique ideas to further the goal of bringing about economic and government reform.

During his closing comments to the National Conference, Ross asked that we give our elected servants the opportunity to accomplish the reforms, and we should keep all of our options open.

Regardless of which option UWSA members may ultimately choose to exercise, Campaign Finance Reform is essential to creating the opportunity for electing good people to public office and keeping them focused on doing what is in the best interest of the country as opposed to responding to the desires of the special interests.

As Winston Churchill once said, "The goal of a politician is to win the next election and the goal of a statesman is to win the next generation."

Let's give the current officeholders the opportunity to display statesmanship and pass the Bipartisan Second Contract With America as the greatest Christmas present we could give to our children and grandchildren. If Congress passes these reforms into law, we have accomplished our goals.

PARTICIPANTS WANT NATIONAL I&R

By PAT BLANCHARD

Initiative and Referendum (I&R) is used in over 20 states across the U.S. to place certain legislative powers in the hands of citizens.

Workshop panelist Rex Wagner of UWSA-TN outlined the process, explaining that "initiative pertains to the process where citizens introduce a matter to the people for a vote. "Referendum" is the right of the people to vote directly on laws, proposed or already in effect, thereby overruling the legislature.

Rick Arnold, author of an I&R newsletter, explained that our representative democracy has become so far removed from being "representative" that it is time to move toward the "direct democracy" that I&R provides the people.

Congressman Pete Hoekstra (R-MI) introduced a series of national I&R proposals, including one that would put term limits on the November 1996 national

ballot for a vote. The proposal would be nonbinding, said John Vanden Heuval, Hoekstra's legislative assistant.

Most attendees approved of an I&R process to set the national agenda because, they said, it would connect issues to congressional elections and it would reduce gridlock.

Although 73 percent of the workshop participants would like to see a national I&R mechanism pass, many remain skeptical that it would be safe from abuse. One concern is the influence of mass media on an uninformed voting public. Also, a workshop participant from California, a state where I&R is widely used, warned that special interests are beginning to use it to promote their narrow interests with high-profile campaigns. Participants agreed measures that protect against big money and special interest abuse must be thoroughly explored and made part of any legislation that would create a national initiative process.

97043793674

UNITED WE STAND AMERICA INC. *Dallas*

MEMORANDUM

(3)

TO: UWSA Team

FROM: Russ Varney *National Director*

DATE: January 12, 1995

SUBJECT: The Start Of Year Three for UWSA

On January 11, 1995, UWSA's two year anniversary, the National Board of Directors met and enthusiastically endorsed an aggressive program to expand the UWSA membership and organize in every neighborhood across the country.

Unanimously the board adopted a plan to strengthen our team work by allowing the organizational structure to be flexible and capable of adapting to different circumstances and dynamics from state to state and city to city. The objective is to make sure we have fun working together and empower every member to use their creative talents and skills to the benefit of our children and our grandchildren.

A new organizational structure was approved which encourages every member to become involved at their own level of interest, whether that is associated with new member recruiting, fundraising, local, state or national issues, communications etc.. Members can organize as clubs, leagues, chapters, task forces, committees or whatever they feel comfortable with. The new structure allows volunteers to stop worrying about bylaws and focus all their energy and enthusiasm on getting our country headed in the right direction.

The new organizational structure allows states that want to continue their corporate structure to do so. In states where the corporate structure is a burden the members want to eliminate, they may do so. There is no requirement to have a state corporation and no requirement to eliminate state corporations. Every state is unique but, without exception, every level of the organization must accept the responsibility of being financially self sufficient.

Regardless of the status of the state corporate structure, the UWSA state director's role has been changed. The state director has been assigned the responsibility of providing service to all our members, recruiting new members, organizing in every neighborhood, building the visibility and image of UWSA and enlisting key volunteers to help.

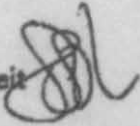
Only team work will allow us to accomplish our goals for 1995. In the last two years the UWSA team has faced some challenges that were new to all of us. The national debate about the Contract With America confirms we have had the right message all along. In last November's election the UWSA team proved the impact of the swing vote all across the country. Now, the UWSA team faces a whole new challenge of expanding our membership and organizing in every neighborhood. As a team we can meet this challenge.

I am personally honored by the National Board of Directors' decision to allow me to serve the UWSA team as executive director.

97043793675



(4)

UNITED WE STAND AMERICA*An educational, nonpartisan, nonprofit organization committed to involving citizens in their government***6276-B Busch Boulevard • Columbus, Ohio 43229 • Phone: 614-841-0202 • Fax: 614-841-0250****DATE:** December 21, 1994**TO:** All CDCs**FROM:** Sandy Recksejt **RE:** Town Hall Meetings

Next week, I will begin setting up town hall meetings around the state, to take place in January and February. We need to find sites for these meetings, and I will be asking for your help, especially from those of you in the following areas:

Cincinnati
Dayton
Columbus
Athens
Toledo
Cleveland
Akron
Youngstown

These sites should have seating for at least 100 people, and should be free! Schools and universities might fit the bill.

The purpose of these town hall meetings is to learn from UWSA members and the public-at-large, if they feel a third party is best for our country.

Call if you have any questions. If I don't talk to you this week, I wish you and your families a warm, wonderful holiday!

97043793676

Date: February 7, 1995

5

TO: Russ Verney
CC: National Board Members, UWSA Inc.

From: Western States Conference of Chairpersons-UWSA

Dear Mr. Verney:

As you know, a meeting of 10 western state UWSA representatives was held February 5, 1995 at the Seattle Marriott Courtyard Hotel. Each state was represented by a volunteer who is either a state chairperson or their appointed representative.

FINDINGS AND RECOMMENDATIONS:

1. The most basic tenant of UWSA was that we would be a member-driven organization and by direction of UWSA Inc., we were to organize in each state and each congressional district to achieve the goals and mission of UWSA Inc. It is obvious that the concept of "member driven" remains an elusive, unfulfilled and deceptive promise.

RECOMMENDATION: WE STRONGLY RECOMMEND THAT UWSA RETURN TO ITS CORE BELIEFS, THAT THIS ORGANIZATION BE GUIDED BY ITS MEMBERS THROUGH THE NATIONAL BOARD AND THAT THE NATIONAL STAFF BE SUPPORT ELEMENTS OF UWSA RATHER THAN COMMAND ELEMENTS OF UWSA.

2. We believe UWSA has been living beyond its means. State organizations have not been allowed to take part in the budgeting and resource allocation process.

RECOMMENDATION: THE PREPARATION OF THE NATIONAL AND STATE BUDGETS AND THE ALLOCATION OF RESOURCES MUST BE OPEN TO VOLUNTEER LEADERSHIP AT BOTH STATE AND NATIONAL LEVELS.

3. There is much confusion and concern about who is in charge in each state. Two organizations are emerging. One is the existing state organization we were directed to form and a second "new" organization directed and controlled exclusively by paid staff. This is unacceptable.

RECOMMENDATION: THE PAID STAFF IMMEDIATELY STOP ESTABLISHING ORGANIZATIONS. THE NATIONAL BOARD RESOLUTIONS OF OCTOBER 1 SHOULD BE CARRIED OUT WITHIN THE SPIRIT AND INTENT OF THESE RESOLUTIONS. A TRUE PARTNERSHIP MUST IMMEDIATELY BE SOUGHT BETWEEN THE DULY ELECTED STATE LEADERS AND THE EXECUTIVE DIRECTORS.

4. The executive directors for the most part receive high marks from this group. However, the capabilities of each director and the unique nature of each state suggests that state organizations should be involved in developing the role and mission of their director. In addition, it is noted that replacement directors are being selected by paid staff without comment or input from the state organization in direct contradiction to national board resolutions.

97043677

RECOMMENDATIONS:

A. THE SELECTION OF DIRECTORS MUST BE COORDINATED WITH THE STATE LEADERSHIP.

B. A PARTNERSHIP MUST BE CREATED BETWEEN THE DIRECTOR AND THE STATE LEADERSHIP TO INSURE UNITY AND COOPERATION.

C. THE STATE MEMBERS SUBMIT (AT LEAST ANNUALLY) A PERFORMANCE EVALUATION OF THEIR STATE'S DIRECTOR.

5. The effectiveness of the regional director was called into serious question by this group. When assessing the contributions vs. the cost of the regional director, not one member present could give an example of a UWSA achievement attributable to our regional director. A second, and more serious conclusion, was that our present regional director was proving to be a destabilizing influence in most states.

RECOMMENDATION: BY A MAJORITY VOTE (SEVEN FOR, NONE AGAINST AND THREE ABSTAINING DUE TO THE LACK OF FAMILIARITY WITH THE SITUATION), THE NORTH WEST REGIONAL DIRECTOR BE ASKED TO RESIGN IMMEDIATELY.

6. The UWSA national board requested the national staff to recommend solutions to UWSA'S communications problems. This has not been done. Also, it is apparent that lateral communication has been discouraged. State leaders are rarely asked what they or the general members think--all that is received is direction.

RECOMMENDATION: THAT IMPROVEMENTS IN COMMUNICATIONS BE GIVEN AN IMMEDIATE PRIORITY, THAT LATERAL AND VERTICAL TWO WAY COMMUNICATIONS NEEDS BE ENCOURAGED, THAT THE NATIONAL STAFF ANSWER THE REQUEST OF THE NATIONAL BOARD TO ESTABLISH A COST EFFECTIVE, STANDARDIZED, AND USER FRIENDLY COMMUNICATION SYSTEM THAT WOULD SERVE THE NEEDS, GOALS, AND OBJECTIVES OF UWSA MEMBERS.

Thank you for your consideration.

Members of the North Western Regional Conference-UWSA

- | | |
|----------------------------|--------------|
| 1. Lillian Villvock | Alaska |
| 2. Margarita Ajanian | California |
| 3. George Fox | Hawaii |
| 4. Sandra Hughes | Idaho |
| 5. Mick Ringsak | Montana |
| 6. Jerry Hjelden | North Dakota |
| 7. Micki Summerhays | Oregon |
| 8. Kathleen Christopherson | South Dakota |
| 9. Duane Schooley Sr. | Washington |
| 10. Jim Brady | Wyoming |

97043793678

Date: 15 February 1995

To: Ross Perot
CC: General Members

From: Dave Morgan (Member UWSA-WA)

Subject: The Seattle Report

Dear Mr. Perot:

Since June of 92, I have been a worker for the cause we all call UWSA. I have served as copy machine operator, our first state chairman, state and local legislative liaison, state forum coordinator, reporter for our newspaper, "banker" (sugar daddy) for the state organization, signature gatherer, and other duties too numerous to mention.

Two weeks ago, Mr. Mick Ringsak asked me to facilitate a fifth of February meeting of UWSA's northwest regional state chairpersons. Ten of them met in Seattle and reviewed, discussed, debated, and resolved issues common to them all. These wonderful people, who have lead us and sacrificed so much of their lives for UWSA, prepared a report with six findings and six recommendations (The Seattle Report). These recommendations were submitted to Mr. Russ Verney late last Tuesday afternoon via FAX.

Just prior to the Seattle report arriving in Dallas, an on-line message from a California UWSA member (LINNC.56263@aol.com) stated "One interesting vote: 7 yes, 0 no, and 3 abstain (because they were new, at least that's what they are saying) to ask that the #1 problem be removed." One of my internet friends cannot find any posting where the entire text of the Seattle Report was shown.

You, Mr. Perot, were apparently so incensed over the partial release of the "Seattle Report" that you asked Russ Verney to get attendees to recant their findings and recommendations. You allowed or directed pressure to be placed on these good citizens and leaders of UWSA.

Mr. Verney focused his pressure upon my friend Mr. Mick Ringsak who had called the chairman's meeting, prepared the agenda, and approved their final report. An exhausted Mr. Ringsak finally succumbed to Russ's pressure and wrote a letter of recantation. His letter sounds like it was dictated by Mr. Verney and reads like a Vietnam era forced confession of a POW. Shame on Mr. Verney and you for placing Mick in this position. Mick deserves better and so do those who attended the conference and who have given so much to UWSA.

Pressure was also applied to the gracious and dedicated Mrs. Lillian Villwock (Alaska Chair) and the feisty yet loyal George Fox (Hawaii Chair). They were given an ultimatum that if they did not produce a letter similar to Mick Ringsak's, that you would pull their state charter. Other attendees were similarly pressured.

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We look to you national leaders to provide guidance and inspiration. In this matter we have received neither - from you or Russ Verney. Since we do live in a free society and since our organization has consistently championed openness over secrecy, I am astonished and disappointed that you would permit such action against such good people. You can't run and hide on this one boss. Russ Verney's action of last week occurred on your watch either at your direction or approval. Realizing you normally disregard advice, especially unsolicited, I nonetheless suggest the following:

- * Apologize to each and every February 5th participant you have asked to reverse their positions.
- * Convene the National Board as soon as possible to address each and every recommendation.
- * Ask each state board, committee, or congressional district still functioning to submit to the national board what their views are regarding the Seattle Report.

From a most concerned UWSA member,

(signed)

Dave Morgan

Facilitator (The Seattle Report)

Western Regional Conference of UWSA Chairpersons

360

~~206~~-668-8847 (H) 206-668-8846 (Home FAX)
206-568-7663 (W) 206-568-7160 (Work FAX)

9704379368C

"Logus" Board
meeting

Sept 17, 1995

mt. Gilead, Ohio

6

FROM: United We Stand America-Ohio, Inc.

TO: The statutory agent of United We Stand America-Ohio, Inc.; depositories, banks and others holding property in the name of United We Stand America-Ohio, Inc.; and others using the names "UWSA, Ohio, Inc." and "United We Stand America-Ohio, Inc."

SUBJECT: Election of Officers

DATE: September 18, 1995

Please be advised that a majority of the Board of Trustees of United We Stand America-Ohio, Inc., in good standing and members of United We Stand America, Inc. did cause a meeting of the Board of Trustees on the afternoon of Sunday, September 17, 1995, at Mount Gilead, Ohio. Notification of aforesaid meeting was faxed to all interested persons with possible standing to vote as a member of the Board of Trustees of United We Stand America-Ohio, Inc., on Wednesday, September 13, 1995 as required by the Code of Regulations of United We Stand America-Ohio, Inc.

The Board of Trustees elected: Jim Kazoun, Chairperson
Dolores Sorg, Vice Chairperson
Barbara Balog, Secretary (Acting)

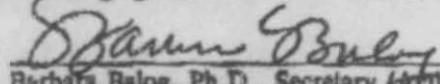
Further, the Board of Trustees by resolution agreed to *not* accept the March 16, 1995, letter of resignation of Ed Jordan as Treasurer and Congressional District Coordinator (CDC) for District 12 because the conditions of Ed Jordan's resignation and Board of Trustees resolutions were not complied with by Deborah Taylor and others. A motion was made and seconded, and passed by the Board without objections, to confirm Ed Jordan as Treasurer of United We Stand America-Ohio, Inc. and CDC of his district.

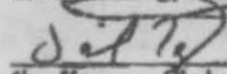
The Board formed a Finance Committee to assist Ed Jordan and the Board of Trustees of United We Stand America-Ohio, Inc. in acquiring and taking control of all books, papers, records, bank accounts and property of United We Stand America-Ohio, Inc. Named to the Committee are Ed Jordan, Jim Kazoun and A.L. Coppock.

The Board by resolution authorized the Finance Committee to take all action necessary to take control of all of the assets of United We Stand America-Ohio, Inc.

NOTE: The names "UWSA, Ohio, Inc." and "United We Stand America-Ohio, Inc." are property and assets of the aforesaid Board of Trustees used under license agreement with and in accordance with licensing agreement of United We Stand America, Inc.

For all to know:


Barbara Balog, Ph.D., Secretary (Acting)


Jim Kazoun, Chairperson

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AVOIDING THE L-WORD

De La Salle's football team focuses on its amazing winning streak 1 D



Home for

How Bay Area con- get by in their D.C.

7

ven without construction boost, state economy surges

ContraCostaTimes

Wednesday, November 1, 1995

Former Perot backers take united stand: They fire him

Grass-roots leaders angry about push for third party

By DANIEL BORENSTEIN
Political Editor

Less than a week after Ross Perot apparently qualified a new party for California elections, 30 former and current state leaders of his grass-roots organization say the Texas billionaire has got to go.

"As you always said, Ross, we are the boss. You are fired," said the United We Stand, America leaders from across the nation.

The group of 30 issued the joint statement after a weekend meeting in Las Vegas. Skip House of Walnut Creek, chairman of the California organization, said Tuesday that members are angry about Perot's push for a third party and his claim that it's a grass-roots effort.

In fact, he said, Perot keeps a tight rein from his headquarters in Dallas.

"Ross says we're the boss, but we're not. He does not delegate authority and then let it go. He wants to have full control, and we don't think that's what this is all about," said House.

"Whenever anyone took any initiative on their own, if it didn't come from Mecca, meaning Dallas, they would just ignore us."

Sharon Holman, spokesperson in Dallas for Perot and United We Stand, America, refused to discuss the complaints. "If they want to be critical of the organization, we're busy," she said. "I don't have time to get into the back and forth."

Accusations of an autocratic management style by Perot are not new. They surfaced during his 1992 presidential bid.

Now, however, some of the very people who were his greatest supporters then are turning against him. The



Perot

"Ross says we're the boss, but we're not. He does not delegate authority and then let it go. He wants to have full control and we don't think that's what this is all about."

— Skip House, state chairman, United We Stand, America

weekend meeting included leaders from some of the biggest states, including California, New York, Michigan and Ohio.

Jim Campbell, acting California chairman of Perot's new Reform Party, dismissed the critics as a "splinter group" and "a bunch of crazies (who) got together and fired Ross."

Campbell acknowledged that "there is certain dissonance" between the grass-roots chapters and the national United We Stand, America. But the critics, he said, are just trying to generate publicity for themselves.

The problem in politics is some people go into it for

Please see PEROT, back page

Perot

FROM PAGE 1A

power position," Campbell said. "It doesn't matter what your organization is, some people infiltrate who want power. . . . There are always some troublemakers who maybe they didn't get their way or they have their own private agenda."

United We Stand, America was formed during the summer of 1992 to collect signatures on nomination petitions so the Texas computer services magnate could qualify for the ballot in all 50 states.

After that election, the group was incorporated to pursue some of the issues Perot raised during his independent presidential bid. The bid this year to place a new party on the ballot drew on many of the group's staff members.

That angered the grass-roots leaders who met in Las Vegas. UWSA was supposed to be nonpartisan, said Deborah Taylor, chairwoman of the Ohio chapter.

"People are furious over this third-party thing," she said. "They don't want it. These are political activists who are Republican and Democrat. It's embarrassing when you've been working with your Republican or Democratic congressman. All of a sudden you're the enemy."

Among the complaints, Taylor said, are the organization of UWSA and the dwindling membership.

She said the group's board of directors is comprised of five paid staffers and five volunteers, with Perot providing the 11th vote. There is no way, she said, that the paid staffers are going to oppose Perot, so he controls the supposedly grass-

INSIDE

Fraud level high in new party voter registration drive.

roots organization.

Membership, meanwhile, has drastically dropped, she said. They started out in the multi-millions and they are down to a couple hundred thousand.

Holman, asked about the accusations, said she didn't know how the board was organized. And, she said, the membership numbers are kept secret.

The group of 30 who met in Las Vegas were among 70 key leaders invited on 30 days' notice, said Taylor. The goal was not to bash Perot or United We Stand, America. Instead, the group developed plans for an Internet information system they will call the RDI Network. RDI stands for Republican, Democrat and Independent.

Nevertheless, the anger toward Perot was clear, she said. "It was pretty understood that everybody had a war story. We weren't getting anywhere with United We Stand, America."

At the end of the weekend, as the group was preparing its unified statement, the anger toward Perot came to the fore, said Marlow Stanley, the leader of the Arizona chapter who was a paid staff person until she was fired.

It was then that the group decided to call for Perot's ouster. "We would not keep this person if we had to fire him," said Taylor. "What started out as an asset has turned into a liability."

"We still believe in the message but the messenger has disappointed us."

— Skip House, state chairman, United We Stand, America
Minileo Debbio: This was Front Page is our most paper here in Contra Costa. This is also the first time this paper has really responded to any thing. I've been involved with over the last several years

97043793682



Processed by
BOB TAFT, Secretary of State
30 East Broad Street, 14th Floor
Columbus, Ohio 43268-0418



Approved _____
Date _____
Fee _____

(8)

REQUEST FOR NAME RESERVATION OR NAME AVAILABILITY

(Check the appropriate item(s))

☒ Please reserve each of the three names listed below which are available. Enclosed please find a separate five dollar check (\$5.00) for each name.

☐ Please reserve the first name available in the order of my preference. One check in the amount of five dollars (\$5.00) is enclosed for this purpose.

I understand that I am not guaranteed the reservation UNTIL I RECEIVE WRITTEN CONFIRMATION FROM THE SECRETARY OF STATE'S OFFICE STATING THAT THE NAME(S) HAS/HAVE BEEN REGISTERED TO ME.

The name reservation is valid for a period of sixty (60) days.

☐ Please ADVISE me as to the availability of this name. I understand that I HAVE NO LEGAL RIGHTS TO THE USE OF THE NAME(S) checked for availability.

The Independence Party

First Choice

The Reform Party

Second Choice

Third Choice

Ralph W. Perkins

Applicant

70416 Wolcott

Address

ARMADA, MI 48005

City, State, and Zip Code

FOR AN AVAILABILITY CHECK BY TELEPHONE PLEASE CALL (614) 466-0590.



FACSIMILE TRANSMISSION

From
UNITED WE STAND AMERICA, INC.
 Ohio Office
 77 E. Wilson Bridge Rd. Worthington, Ohio 43085

DATE: NOV 14

TO:

~~DATE SUBJECT~~
~~TO: [REDACTED]~~
 Morris Clark

FROM:

DICK TAYLOR

PHONE NO. 614-888-UWSA

FACSIMILE NO: 614-888-2515

NO. OF PAGES:

3

(includes this cover sheet)

MESSAGE.

FYI

97043793684

Strategy for Ohio Reform Party Final Week

As you can see on the chart, we are approximately where we should be right now in the numbers of signed petitions reported thus far. However, there is no time to relax. We need a big effort to both use our momentum to go over the top, and to collect the work that has already been done.

Reports: On the tracking graph, you can see that we are within the envelop on reported numbers which should take us to a successful conclusion, but since it requires a continued upward movement, we must continue to work our plan, using all approaches that work, especially networking groups who are receptive, and working fixed, inside sites that will allow us to set up there. We are moving in the right direction, but we still need to peak by this weekend.

Receipts: The other aspect of the chart is the track of petitions received in Columbus. As you can see, we are lagging on receipts. Petitions are screened here, copied, filed, and sorted by county. We need to receive them as soon as possible so that effort can be finished before we make the turn-in. This week, please fedex daily the signed and witnessed petitions, call in petitions held by volunteers using the phone trees, 800 number lists, and other networks. Plan to have all remaining petitions handcarried to Columbus on Sunday evening, and again on Monday around noon, if necessary.

Turn-in: The turn-in of petitions is tentatively planned for early afternoon on Monday, November 20th, at the Secretary of State's office or in that vicinity. There will be an associated press conference. Further details will be announced later. Key volunteers are certainly invited to attend.

Volunteer Recognition: Team leaders should plan for a modest recognition reception in the field offices on Monday evening, beginning in the early evening, with refreshments. Invite all who were helpful, press, and have a speaker phone on hand for a call. Keep the costs down for this event, but make it suitable for your area. As a minimum, have a speaker phone that has been checked out in advance, and can be heard by all in attendance.

Final arrangements: Turn in or ship all equipment or supplies as directed to the next location, home locations, or return to Columbus, as appropriate. Call me about close out plans and departure schedules for all team members. Have a great Thanksgiving, and be prepared for the next event. Please prepare a list of key volunteers for Sandy Reckseit, along with any comments that might be useful in the party organization efforts to follow, prior to your departure. Please complete the after action report attached, and forward to Dick Taylor, so that they can be consolidated for Russ. It is also sent via cc:mail, and that is the preferred method of returning it. Otherwise, please have it sent by overnight mail or handcarried.

Thank you for your extraordinary efforts and cooperation. This has been a great team to work with. You are the Best!

Enclosed:

Graph (fax only)

97043793685

..... Citizens to Establish a Reform Party in Ohio

P.O. Box 340288

Columbus, Ohio 43234

(614) 888-9600

fax: (614) 888-2515

News Advisory

ROSS PEROT TO ATTEND OHIO REFORM PARTY PETITION TURN-IN

FOR IMMEDIATE RELEASE:

Friday, November 17, 1995

Contact: Richard Taylor.....

Columbus, Ohio - Russ Verney, National Coordinator for the new Reform Party, announced today that Ross Perot will be in Columbus on Monday, November 20, 1995 at 2:00 p.m. ET when petitions for the new Reform Party in Ohio will be presented to Ohio Secretary of State Bob Taft. The 2:00 p.m. meeting with volunteers will be in the lobby of the state office building, Rhodes Tower, adjacent to the Capitol at 30 East Broad Street. Mr. Perot will meet with the Ohio volunteers to congratulate them on their extraordinary efforts in gathering the necessary signatures to gain ballot access for the '96 elections. There will be press availability.

In Ohio, 33,463 petition signatures are required. Richard Taylor, Ohio coordinator, said, "The Ohio volunteers achieved the minimum number of signatures to qualify in only 20 days, but we will continue to gather petition signatures until the November 20 deadline."

Taylor continued, "This has been a tremendous accomplishment by the Ohio volunteers, especially considering the unseasonably bitter weather. They have really risen to the occasion, which shows how anxious the voters of Ohio are to have an alternate to the existing parties. We are sending a strong message to Washington demanding no more 'politics as usual.'"

The Reform Party was officially certified in California with 117,620 signatures. The ballot access process, which normally takes two years, was accomplished in a record 20 days in California.

UWSA ACTIVITIES CALENDAR

Below is a listing of UWSA statewide events. Many meetings and events are constantly occurring on the local level – far too many to print in this space. However, many states now have state newsletters or publications to keep you up-to-date on local UWSA news. Contact your state office and get on the mailing list.

Local volunteers are actively working on specific issues and on qualifying the new political party. Don't miss your chance to make a difference in your area – call your state to find out how you can help today!

OCTOBER

MICHIGAN: On Oct. 23, Ross Perot will speak to the Economic Club of

Detroit. The noon luncheon will be held at the Cobo Center at 1 Washington Boulevard. Tickets are available to UWSA members for \$16.00. Make your check payable to the Economic Club of Detroit and mark it for the Ross Perot luncheon. Send ticket request and payment to the Economic Club of Detroit, 333 West Fort St., Suite 100, Detroit, MI 48226-3134.

NEW JERSEY: UWSA-NJ will hold its third annual state conference on Oct. 28, at the state office in Edison, NJ. Invited speakers include Rep. Linda Smith (R-WA) on campaign finance reform; Rep. Marcy Kaptur (D-OH) on trade policy, and leaders of the Democratic, Republican and Conservative parties regarding the State Assembly races in November.

Call the New Jersey office at (800) 964-7677 for details.

9

NOVEMBER

MISSOURI: On Nov. 1, Ross Perot will address nearly 3,000 students at the University of Missouri at Columbia. Tickets are required for admission, but they are free of charge. UWSA members who are interested in attending should call the UWSA-MO office at 1-800-890-5295.

ANNOUNCEMENTS

NEBRASKA: UWSA-NE has opened a new office in the third district. The office is located at 110 E. Douglas, in O'Neill, NE 68763. The phone number is (402) 336-2074 and the fax number is (402) 336-3966.

UWSA STATE CONTACTS

Alabama	(205) 870-3555
Alaska	(800) 610-5644
Arizona	(800) 884-9789
Arkansas	(501) 785-3048
California	(310) 826-5224
Colorado	(303) 782-9448
Connecticut	(203) 721-UWSA
Delaware	(302) 734-4780
Florida	(904) 224-5031
Georgia	(404) 816-4770
Hawaii	(800) 610-5644
Idaho	(800) 949-5621
Illinois	(708) 776-9880
Indiana	(800) 956-9862
Iowa	(800) 355-UWSA
Kansas	(913) 599-5454
Kentucky	(502) 893-2897
Louisiana	(318) 263-3300
Maine	(207) 990-2222
Maryland	(410) 280-UWSA
Massachusetts	(617) 349-3505
Michigan	(810) 476-6400
Minnesota	(800) MN4-UWSA
Mississippi	(601) 354-9222
Missouri	(800) 890-5295

Montana	(800) 232-8522
Nebraska	(402) 393-4772
Nevada	(702) 384-UWSA
New Hampshire	(603) 224-VOTE
New Jersey	(908) 985-1056
New Mexico	(505) 837-2737
New York	(800) 854-4388
North Carolina	(704) 692-8452
North Dakota	(701) 281-9667
Ohio	(614) 888-UWSA
Oklahoma	(800) 479-UWSA
Oregon	(800) 610-5644
Pennsylvania	(800) 299-UWSA
Rhode Island	(401) 946-2111
South Carolina	(803) 582-UWSA
South Dakota	(605) 341-9173
Tennessee	(615) 365-6769
Texas	(214) 450-8893
Utah	(801) 943-9665
Vermont	(800) 854-4388
Virginia	(804) 359-9696
Washington	(509) 468-7801
West Virginia	(304) 744-8870
Wisconsin	(608) 271-1293
Wyoming	(800) 232-8522

United We Stand America, Inc. was launched on January 11, 1993. It is an educational, nonpartisan, nonprofit organization committed to involving citizens in their government.

RUSSELL J. VERNEY

UWSA Executive Director

SHARI GUTHRIE

UWSA National Newsletter Editor

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This publication encourages your feedback:

UWSA National Newsletter

P.O. Box 516087

Dallas, TX 75251

**UWSA NATIONAL
INFORMATION CENTER
(214) 960-9100**

**MEDIA (pre-recorded)
(214) 450-8874**

UWSA members are welcome to copy and distribute this newsletter. The UWSA membership list is private, and is not sold, rented, or made available in any form to any other organization.

97043793687

PRESS RELEASE - OCTOBER 24, 1995

UWSA-OHIO, INC. POSITIONS ON THIRD PARTY AND "BOGUS BOARD"

5318 N. High St., Columbus, Ohio 43214 - Phone 614-848-9484; Fax 614-442-0469

Contacts: Deborah Taylor, Chair - phone 216-788-6508; Fax 216-788-0645

Anne Saucier, Secretary - phone 614-848-9484; Fax 614-442-0469

The legally elected corporate Officers and Board of Trustees of United We Stand America-Ohio, Inc. convened a telephone conference call on October 23, 1995. Meeting was called to clarify the Board's position on two urgent issues: (1) Ross Perot's current venture to launch a Third Party; and (2) the recent plot by two Board members to form a "bogus" or "rogue" board to capture our Board's assets.

This hostile takeover attempt was apparently crafted, initiated, encouraged, and supported by the National UWSA, Inc. paid staff. Since December of 1994, this paid staff has endeavored to force all State Corporations to dissolve and follow, without question, orders from the National UWSA Corporation.

The two most significant resolutions made, and passed overwhelmingly, are:

- UWSA-OHIO, Inc. - an educational, non-profit, non-partisan corporation - legally cannot be involved in the formation of the "Reform" or "Independence" Party. None of our corporate assets will be used to further this endeavor. However, UWSA-Ohio, Inc. does encourage interested members to participate in the political process.
- Registered letters will be sent to our two Board members - Jim Kazoun and Delores Sorg - informing them of the multiple violations of our bylaws by the "bogus" or "rogue" board, and giving them ten days to make sufficient response in their defense, pending threatened removal from the legal Board.

The UWSA Ohio and other State Corporations cannot be involved in a third party effort without violating FEC regulations and threatening their non-profit status.

On December 21, 1994, without consulting the Chair or any member of the Board of United We Stand America-Ohio, Inc., Executive Director Sandra Reckseit (acting on decisions made by Ross Perot's paid staff) announced that she would "begin setting up town hall meetings...to learn from UWSA members and the public-at-large, if they feel a third party is best for our country." In retrospect, this was also the beginning of the escalating campaign to dismantle the State Corporations in order to gain complete control over the UWSA membership.

From a survey of the fifty states, we found that about two-fifths of the states dissolved (or are in the process of dissolving) their corporations, but the rest have recognized the necessity of maintaining their corporations if volunteer members are to retain power as OWNERS OF THIS COUNTRY.

See attachments re: "The Meeting of the States" in Las Vegas, October 27-29, 1995

97043793688



UNITED WE STAND AMERICA-OHIO, INC.
5500 Market Street, Suite 92
Youngstown, Ohio 44512

FOR IMMEDIATE RELEASE
NOVEMBER 9, 1995

"DIRTY TRICKS" FROM PEROT STAFF SPUR FEC COMPLAINT

"UWSA-OHIO INC. is preparing a formal complaint for the Federal Elections Commission in order to obtain answers to the legal ramifications of actions of the Perot paid staff," said Deborah Taylor, UWSA-Ohio Inc. State Chair. These actions include but are not limited to the use of United We Stand America's (a non-profit, non-partisan organization) mailing lists, personnel, and equipment to assist the "REFORM PARTY" obtain ballot access. "We have serious, legitimate concerns which have never been answered by either the Perot staffers or the FEC," Taylor added.

This latest action came as a result of a state-wide mailing of Reform Party petitions and electronic phone calls promoting the Reform Party using the confidential data base of United We Stand America. All UWSA National Newsletters clearly state the private data base is not to be "sold, rented or made available in any form to any other organization." This data base has been kept so secret that many volunteer leaders have no access to the members of their own organization.

Due to the questionable nature of the Reform Party activities as it relates to a non-profit corporation, the Board of UWSA-Ohio Inc. unanimously passed a resolution stating they would not use any corporate assets to support the ballot access effort but did encourage members to become involved in all areas of the political process. "The use of mailing lists and staff is in direct opposition to the spirit and intent of our resolution," said Anne Saucier, UWSA-Ohio Inc. Corporate Secretary. "We believe the formation of a Third political party should remain completely separate from all of UWSA. We are concerned that if the FEC and/or the IRS should rule against the national UWSA corporation, a domino effect will destroy the separate state corporations. Everything we have worked to build for the past three years will be destroyed needlessly."

Adding fuel to the fire was the report that the Cleveland area was being bombarded with electronic phone calls containing false and fraudulent information by quoting a "puppet" board that the paid staff has established to counteract the vociferous opposition from the elected UWSA-Ohio Inc. board. A member copied the message verbatim, "Hello, this is a United We Stand America Volunteer Alert. The UWSA Ohio Board of Directors voted overwhelmingly to support Ross Perot's effort to form a new political party in Ohio. The petition turn-in deadline for the Reform Party of Ohio is November 17. Volunteers are urgently needed to help obtain petition signatures. To help with this effort, please come by our Cleveland office at 19512 Center Ridge Road in Rocky River or call 216-331-9909."

Taylor concluded by adding that other states are seriously considering following Ohio's lead and file FEC complaints. "The very existence of our organization is at stake," she said.

FOR FURTHER INFORMATION CONTACT:

Deborah N. Taylor, UWSA-Ohio Inc. Chairperson (216) 788-6508 FAX: 788-0645
Anne Saucier, UWSA-Ohio Inc. Secretary (614) 848-9484 FAX: 442-0469

3rd-party effort chugs along

As California's deadline looms, Ross Perot's effort to create a third political party needs 89,007 people to join up and is meeting with success just one signature at a time.



PEROT USA TODAY

By Judy Keen 8A
USA TODAY Oct 9, 1995

SAN DIEGO — Tracy Landauer and Nabby Ramirez flank the doors of Long's Drugs in a Mission Valley strip mall on a steamy afternoon.

The women are the infantry of Ross Perot's quest to create a third political party. Armed with smiles, petitions and voter registration forms, they approach each exiting customer: "Will you help us get a third party on the ballot?" they ask.

Some people hurry by without responding, some say no thanks, some say they've already signed. One woman says she's happy with President Clinton, thank you. A man asks if Colin Powell will be the party's presidential nominee. "At this point he's not a candidate, but we need strong candidates like him," Landauer answers.

A few, like real-estate developer Joe Brock and teacher Mariena Sanders, stop.

"I just like everything Ross Perot says," explains Sanders, who's with her 3-year-old, Janey. "He speaks in terms we can understand."

Brock, a Republican who voted for Perot in the 1992 presidential election, says, "You've got the status quo — the liberals and conservatives. We need somebody to speak for the rest of us."

To give Perot that chance, supporters like Ramirez and Landauer must register 89,007 voters by Oct. 24 to get his party on the ballot in California, the state with earliest deadline for qualifying.

Perot supporters began their drive with a different strategy. Organizers were initially told by California Secretary of State Bill Jones' office that they could get on the ballot by collecting 890,064 peti-

tion signatures by Oct. 24.

Last Wednesday, Jones' office said it had made a mistake: The actual deadline for certifying a new party by petitions is Nov. 13, but county registrars have 30 business days to verify signatures. That means the petitions were due Sept. 18.

So, Perot backers now face a tougher alternative: finding 89,007 voters to join the party — registering for the first time or changing their party affiliation — by Oct. 24.

"We will get the required number of signatures," Perot promises.

Perot got 2,296,006 votes in California in 1992, which would seem to give him ample base from which to cull the needed registrations.

But voter registrations are much harder to get than petition signatures. The last new political party to qualify for California's ballot, the Green Party, took two years to collect the 79,000 required then.

"Voter registration is more difficult," says Landauer. "For a lot of people, it's like changing their religion. But this doesn't really change the game plan. We're still out here slugging away."

A Sept. 29 USA TODAY/CNN/Gallup Poll found 46% favor Perot's plan to create a political party, and 50% would sign petitions to get it on state ballots. But only 26% said they would join it.

Perot paid \$360,000 to place full-page ads in 41 California newspapers on Oct. 1. Fifty staffers of United We Stand America, the nonpartisan organization he formed after the 1992 election, have been brought into the state.

Four have been assigned to the United We Stand America office here, a 14-foot by 15-foot room on the second floor of a black glass and white concrete office building,

staffed by local volunteers.

A ceiling tile is still missing from the installation of two new phone lines to handle Perot's Reform Party effort, and the blue carpet is littered with boxes of voter registration forms and blue and white yard signs.

There's one table, one desk, four chairs and a large copying machine that's churning out membership lists. On the walls are a giant United We Stand America poster and maps of congressional districts and zip codes.

Volunteer Ted Muga, a retired pilot, is poking through a phone book looking for the nearest post office so he can research mass-mailing rates. Violet Warnaky answers the endlessly ringing phone, a finger jammed in her other ear to drown out the clatter of a nascent political movement.

There's enough energy in the room to spark the grass-roots combustion Perot is counting on. Asked if they can succeed, the volunteers say in unison, "Absolutely!"

But John Herrington, California GOP chairman, is among those who think it will be hard to transform volunteer energy into enough registrations to make Perot's party a reality in just three weeks.

"I am doubtful," he says. "But the most important point is this: It's a different environ-

ment. In 1992, we had a sitting Republican president who had broken his promise on taxes, we had a large portion of the party disaffected. ... We don't have that situation today."

Herrington's skepticism is partly wishful thinking. Republicans fear their nominee and Perot will split the anti-Clinton vote and get the Democrat re-elected. In 1994, backers of Perot's presidential ambitions chose GOP congressional candidates by a ratio of three to two.

Ramirez and other true believers shrug off that criticism. Just as many Democrats as Republicans showed up at workshops and call for information, she says.

Although some supporters of the Reform Party movement suspect the Texas billionaire really wants to propel himself into another presidential bid, his followers here disagree. "It's our party, not his," says Landauer.

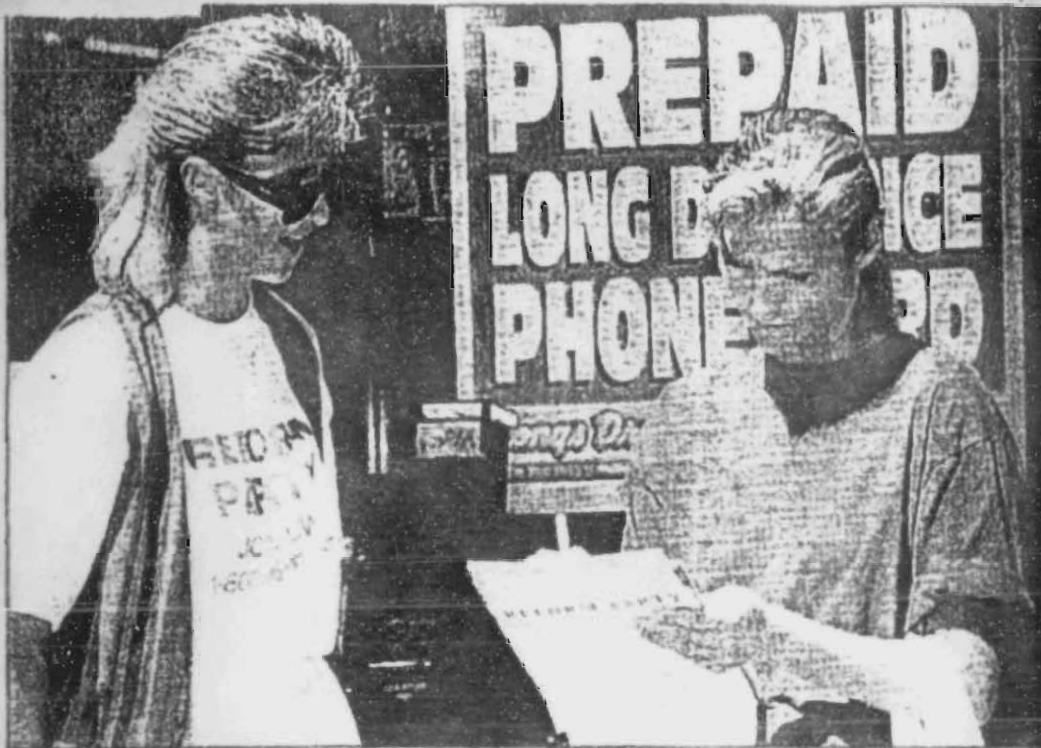
While the days tick off, volunteers gauge success one voter at a time. Dentist Barbara Castle stops at Long's Drugs to read the Reform Party fact sheet on lobbying reform, a balanced budget, term limits and tax changes.

"Is this Perot's new party?" Castle asks. "Can I keep this? We certainly need some sort of reform."

Perot paid
\$360,000 for ads
Fifty staffers of
UWSA used
plus UWSA
offices - See
next page

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97043793691



Photos by Michael Pocha, AP
'WILL YOU HELP US?' Tracy Landauer, above, signs up Marlena Sanders, a first-grade teacher and third-party supporter in San Diego. Says Sanders: 'I just like everything Ross Perot says. He speaks in terms we can understand.' Perot's petition team, including Nabby Ramirez and Violet Warnaky, at left, must register 89,007 California voters by Oct. 24.

USA Today . page 8A . October 9, 1995

PETITION TO FORM A POLITICAL PARTY

12

Revised Code Sections 3517.01, 3517.011 and 3501.38

PURPOSE

"A political party within the meaning of Title XXXV of the Revised Code is any group of voters which ... filed with the secretary of state ... a petition signed by qualified electors equal in number to at least one per cent of the total vote for governor or nominees for presidential electors at the last preceding election".
Revised Code Section 3517.01.

DECLARATION

We, the undersigned, hereby declare that we are qualified electors of the State of Ohio, that it is our intention to organize a political party which shall be known as the REFORM party, and that it is our intention to participate as a political party in the next succeeding primary election held in even numbered years, which shall occur more than one hundred twenty days from the date this petition is filed in the office of the Secretary of State.

We hereby designate the persons named below as a committee to be regarded as filing this petition.

NAME	RESIDENCE
Sandra Reckseit	2694 McVey Blvd. West, Columbus, Ohio 43235
David Reckseit	2694 McVey Blvd. West, Columbus, Ohio 43235
Robert Fischer	2410 SR 222 South, New Richmond, Ohio 45157
Mildred Fischer	2410 SR 222 South, New Richmond, Ohio 45157
Rosalyn (Lynn) Williams	255 Corona Avenue, Dayton, Ohio 45419

Signatures on this Petition must be from only one County and must be written in Ink.

	SIGNATURES	STREET ADDRESS OR R.F.D.	CITY, VILLAGE, OR TOWNSHIP	Ward	Precinct	COUNTY	Date of Signing
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

Citizens to Establish A Reform Party, P.O. Box 340288, Columbus, Ohio 43234 800-96-PARTY

97043793692

	SIGNATURES	STREET ADDRESS OR R.F.D.	CITY, VILLAGE, OR TOWNSHIP	Ward	Precinct	COUNTY	Date of Signing
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							

970437

(Printed Name of Circulator) declares under penalty of election falsification that he/she is a qualified elector of the State of Ohio and resides at the address appearing below his/her signature hereto; that he/she is the circulator of the foregoing petition containing _____ signatures; that he/she witnessed the affixing of every signature, that all signers were to the best of his/her knowledge and belief qualified to sign, and that every signature is to the best of his/her knowledge and belief the signature of the person whose signature it purports to be.

(Signature of Circulator)

(Residence Address of Circulator)

(City, Zip)

THE PENALTY FOR ELECTION FALSIFICATION IS IMPRISONMENT FOR NOT MORE THAN SIX MONTHS OR A FINE OF NOT MORE THAN \$1,000 OR BOTH

CERTIFICATE OF VALIDITY

The State of Ohio, Franklin County, ss.

I hereby certify that I have reviewed and examined the foregoing Petition and find the same sufficient and valid.

IN WITNESS WHEREOF, I have hereunto subscribed my name and caused the official seal of the Secretary of State of the State of Ohio to be affixed at Columbus, Ohio, this _____ day of _____, 19____.

[Seal]

Secretary of State



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 30, 1995

Deborah Taylor, Chairperson
United We Stand America-Ohio, Inc.
5500 Market Street, Suite 92
Youngstown, OH 44512

RE: MUR 4284

Dear Ms. Taylor:

This letter acknowledges receipt on November 22, 1995, of your complaint filed on behalf of United We Stand America-Ohio, Inc. alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 4284. 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

cc: M. Anne Saucier
Clifford O. Arnebeck, Jr.

97043793694



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

H. Ross Perot
12377 Merrit Drive
Dallas, Texas 75251

RE: MUR 4284

Dear Mr. Perot:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793695

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

970437933696



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Ralph Perkins
North Central Regional Director-UWSA
70416 Wolcott
Armada, MI 48005

RE: MUR 4284

Dear Mr. Perkins:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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97043793697

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

97043793698



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 30, 1995

Sandy Reckseit, Executive Director
United We Stand America-OH
2694 McVey Blvd. West
Columbus, OH 43235

RE: MUR 4284

Dear Ms. Reckseit:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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97043793699

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

97043793700



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 30, 1995

David Shaver, Executive Director
United We Stand America-PA
355 N. 21st Street
Camp Hill, PA 17011

RE: MUR 4284

Dear Mr. Shaver:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793701

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

97043793702



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 30, 1995

Claire Geddes, Executive Director
United We Stand America-UT
2477 E. Fort Union Blvd.
Salt Lake City, UT 84121

RE: MUR 4284

Dear Ms. Geddes:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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97043793703

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

97043793704



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Rosemarie Sax, Executive Director
United We Stand America-CO
1805 South Belair
Denver, CO 80222

RE: MUR 4284

Dear Ms. Sax:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043705

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

97043793706



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Debi Berberich, Executive Director
United We Stand American-WI
5282 Williamsburg Way
Madison, WI 53719

RE: MUR 4284

Dear Ms. Berberich:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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97043793707

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

97043793708



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Wade Habshey, Executive Director
United We Stand America-IN
5987 East 71st Street
Fishers, IN 46038

RE: MUR 4284

Dear Mr. Habshey:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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97043793709

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

9704379371C



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Don Mott, Executive Director
United We Stand America-VA
911 Elden Street
Herndon, VA 22070

RE: MUR 4284

Dear Mr. Mott:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793711

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

97043793712



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Norris Clark, Executive Director
United We Stand America-NJ
100 Metroplex, #202
Edison, NJ 08817

RE: MUR 4284

Dear Mr. Clark:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793713

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

97043793714



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Richard Taylor, Executive Director
United We Stand America-GA
1380 W. Paces Ferry Road, NW
Atlanta, GA 30327

RE: MUR 4284

Dear Mr. Taylor:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793715

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

97043793716



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 30, 1995

Treasurer
United We Stand America, Inc.
7616 LBJ Freeway, Suite 727
Dallas, TX 75251

RE: MUR 4284

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that United We Stand America, Inc. 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 4284. 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 United We Stand America, Inc. 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.

97043793717

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

97043793718



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Russell Verney, National Executive Director
United We Stand America, Inc.
7616 LBJ Freeway, Suite 727
Dallas, TX 75251

RE: MUR 4284

Dear Mr. Verney:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793719

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

97043793720



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Treasurer
Citizens to Establish a Reform Party
77 E. Wilson Bridge Road
Worthington, OH 43085

RE: MUR 4284

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Citizens to Establish a Reform Party 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 4284. 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 Citizens to Establish a Reform Party 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.

97043793721

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

97043793722



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

David Reckseit
2694 McVey Blvd., West
Columbus, OH 43235

RE: MUR 4284

Dear Mr. Reckseit:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793723

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

97043793724



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Rosalyn (Lynn) Williams
255 Corona Avenue
Dayton, OH 45419

RE: MUR 4284

Dear Ms. Williams:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793725

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

97043793726



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 30, 1995

Robert and Mildred Fischer
2410 SR 222 South
New Richmond, OH 45157

RE: MUR 4284

Dear Mr. & Ms. Fischer:

The Federal Election Commission received a complaint which indicates that you, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4284. Please refer to this number in all future correspondence.

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

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

97043793727

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

97043793728

HUGHES & LUCE, LLP.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL1717 Main Street
Suite 2800
Dallas, Texas 75201
214/939-3300
214/939-6100 (fax)

Attorneys and Counselors

DEC 14 5 24 PM '95

Writer's Direct Dial Number

Other Offices

Austin
Houston
Fort Worth

December 14, 1995

VIA FAX

Ms. Alva E. Smith
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

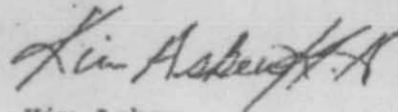
Re: MUR 4284 - H. Ross Perot and United
We Stand America, Inc., et al.

Dear Ms. Smith:

This letter requests an extension of time of thirty (30) days to respond to the letter dated November 30, 1995, giving notice of the complaint that was filed by United We Stand America-Ohio, Inc. Because counsel was only recently appointed to this matter and the upcoming holiday schedule, counsel requires this additional time to review the matter and surrounding facts. Based on the date of receipt, the original response date would be December 19, 1995. If the requested extension is granted, the response will be due January 18, 1995. Enclosed please find Statements of Designation of Counsel from Ross Perot and United We Stand America, Inc., et al.

Thank you for your consideration. If you have any questions, please call me.

Sincerely,



Kim Askew

Enclosures

97043793729

STATEMENT OF DESIGNATION OF COUNSELMUR 4284NAME OF COUNSEL: Hughes & Luce, L.L.P.FIRM: Hughes & Luce, L.L.P.ADDRESS: 1717 Main StreetSuite 2800Dallas, Texas 75201TELEPHONE: (214) 939-5579FAX: (214) 939-6100

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

12/14/95
DateMathew D. Sawyer, Attorney
Signature

Mathew D. Sawyer, Attorney

RESPONDENT'S NAME: United Way Grand America, Inc. and its officers, employees,
agents, affiliates and other related entities

ADDRESS: 7615 I.B.J. FreewaySuite 727Dallas, Texas 75251TELEPHONE: HOME (214) 491-6730BUSINESS (214) 450-8872

97043793730

STATEMENT OF DESIGNATION OF COUNSELMLR 4284NAME OF COUNSEL: Hughes & Lucas, L.L.P.FIRM: Hughes & Lucas, L.L.P.ADDRESS: 1717 Main StreetSuite 2800Dallas, Texas 75201TELEPHONE: (214) 939-5579FAX: (214) 939-6100

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

12-14-95
Date
SignatureRESPONDENT'S NAME: H. Ross PerotADDRESS: 12377 ^{MERIT} MERITT DriveDALLAS, TEXAS 75231TELEPHONE: HOME (214) 788-3001BUSINESS () SAME

97043793731



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 18, 1995

Kim Askew, Esq.
HUGHES & LUCE, L.L.P.
1717 Main Street
Suite 2800
Dallas, TX 75201

RE: MUR 4284
H. Ross Perot
United We Stand America, Inc.

Dear Ms. Askew:

This is in response to your letter dated December 14, 1995, requesting an extension until January 18, 1996 to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on January 18, 1996.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Alva E. Smith", is written above the typed name.

Alva E. Smith, Paralegal
Central Enforcement Docket

9704379332

2410 SR 222 South
New Richmond, Ohio 45157
December, 14, 1995

To Whom It May Concern: Dec 10 12:09 PM '95

In response to your letter dated November
30, 1995, postmarked December 1, 1995 and received by us
December 4, 1995 - RE - MUR 4384.

1. Our only affiliation with United We
Stand America, Inc. is as members of The National
Organization based in Dallas, Texas. Our
membership activities are limited to receiving the
news letter and contacting our Congressman regarding
issues of importance to us.

2. In compliance with the requirements
of The State of Ohio, we acted as communication
contacts during the petition drive for ballot
access for the Reform Party of Ohio. All activities
related to this was as volunteers.

As Citizens of Ohio and The United States
we hold that these activities are within our
rights and that these activities do not conflict
with any Federal Election Commission laws,
rules or regulations.

Sincerely,

Robert J. Smith
Mildred Fischer

97043733

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 26 10 55 AM '95

December 21, 1995

Ms. Mary L. Taksar, Attorney
Central Enforcement Docket
General Counsel's Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

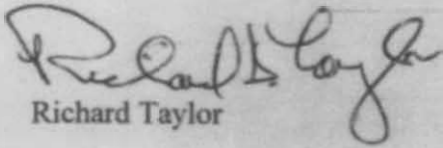
RE: MUR 4284

Dear Ms. Taksar:

Due to an extended period of time away from my office, I have only received your communication regarding the above referenced complaint today. It is my understanding that this matter is being handled from Dallas.

Please let me know if any further information is needed from me.

Sincerely,


Richard Taylor

97043793734

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL LAWRENCE NOBLE
ROOM 657
999 E. STREET
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 27 11 34 AM '95

MUR 4284

RE/ " UNITED WE STAND AMERICA-OHIO INC. VS H. ROSS PEROT, CITIZENS TO
ESTABLISH A REFORM PARTY, UNITED WE STAND AMERICA INC."

DEAR MR. NOBLE:

THE CHAIRMAN OF THE FINANCE COMMITTEE OF UNITED WE STAND AMERICA-OHIO
INC. AND THE NEWSPAPERS HAVE BROUGHT A MATTER TO OUR ATTENTION. THE
MATTER IS THE LAW FIRM OF ARNEBECK & CHRISTENSEN HAS FILED A COMPLAINT
TO YOUR COMMISSION STYLED AS " UNITED WE STAND AMERICA-OHIO, INC. VS H.
ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
AMERICA INC." WITH OUT THE AUTHORIZATION OF THE BOARD OF TRUSTEES OF
UNITED WE STAND-OHIO INC.. THE CODE OF REGULATIONS REQUIRES THE BOARD
OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.'S APPROVAL OF ANY
EXPENSE BEFORE IT IS INCURRED. MR. NOBLE PLEASE BE ADVISED THAT A
QUORUM OF THE BOARD OF TRUSTEES HAS NOT AUTHORIZED ANYONE TO CONTACT
ANY ATTORNEY FOR LEGAL SERVICES, OR WAS ANY MATTER BROUGHT TO THE
BOARD OF TRUSTEES REQUESTING THAT LEGAL SERVICES OF ARNEBECK &
CHRISTENSEN BE ACQUIRED OR OBTAINED. REASONABLE MINDS MUST CONCLUDE
THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN DOES NOT HAVE UNITED WE
STAND AMERICA-OHIO INC. AS A CLIENT.

PLEASE BE ADVISED THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS
AUTHORITY TO ACT AS LEGAL COUNSEL FOR UNITED WE STAND AMERICA-OHIO
INC. FURTHER THE COMPLAINT STYLED " UNITED WE STAND AMERICA-OHIO INC.
VS H. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
AMERICA, INC." SHOULD BE FORTHWITH DISMISSED BECAUSE THE LAW FIRM OF
ARNEBECK & CHRISTENSEN LACK AUTHORITY TO BE LEGAL COUNSEL, POWER OF
ATTORNEY OR AN AGENT OF UNITED WE STAND AMERICA- OHIO INC.

PLEASE BE FURTHER ADVISED: SEPTEMBER 17, 1995 THE BOARD OF TRUSTEES OF
UNITED WE STAND AMERICA-OHIO INC. ELECTED NEW OFFICERS AND IMMEDIATELY
REMOVED ONE DEBORA TAYLOR FROM OFFICE AND REMOVED ONE M. ANN SAUCIER
FROM OFFICE. THEREFOR DEBORA TAYLOR AND M ANN SAUCIER LACK LEGAL
AUTHORITY TO PERFORM ANY LEGAL FUNCTION ON BEHALF OF THE BOARD OF
TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.

MR. NOBLE, IN SIMPLE WORDS YOU DO NOT HAVE A COMPLAINT BECAUSE THE
ATTORNEY HAS NO AUTHORITY TO ACT IN BEHALF OF THE CORPORATION, THE
SIGNATURES OF THE COMPLAINT WERE REMOVED FROM OFFICE AS OF SEPT. 17,
1995 AND HAVE NO AUTHORITY TO ACT IN ANY CAPACITY RELATIVE TO THE
CORPORATION OF UNITED WE STAND AMERICA-OHIO INC..

ATTACHED IS A LETTER SENT TO THE LAW FIRM OF ARNEBECK & CHRISTENSEN BY
CERTIFIED MAIL. article no. P 292 612 047. THE LAW FIRM HAS NOT
RESPONDED WRITTEN REQUEST.

97043793735

November 20, 1995

"Arnebeck & Christensen
65 E. State Street Suite 1000
Columbus, Ohio 4315

ATTENTION: CLIFFORD O. ARNEBECK Jr.

Please be advised that the writer will forth-with file a complaint to the Ohio Supreme Court Disciplinary Counsel unless the following information is instantly provide to the writer.

The information requested is as follows:

1. A copy of the board of trustees resolution of United We Stand America-Ohio Inc. authorizing you to prepare and file a federal elections commission complaint (exhibit A. over your seal) with the secretary of state of Ohio Robert Taft Nov. 20,1995 and the Federal Elections Commission.

2. A copy of the contract signed by any officer of United We Stand America-Ohio Inc. authorizing the law firm of Arnebeck & Christensen to be the attorney for United We Stand America Ohio Inc..

3. Copy of any check for fees bearing the words United We Stand America-Ohio Inc. made payable to the law firm of Arnebeck & Christensen and receipt generated by the above named law firm to show payment for past and/or present and/ or future legal services contracted between the law firm of Arnebeck & Christensen and United We Stand America-Ohio Inc.

4. A copy of the board of trustees resolution of United We Stand-Ohio America Inc. authorizing Ann Saucier and Deborah Taylor to authorize the law firm of ARNEBECK & CHRISTENSEN TO BE THE THE LEGAL COUNSEL OF UNITED WE STAND AMERICA-OHIO, INC .

PLEASE BE ADVISED THAT THE WRITER IS A MEMBER OF THE BOARD OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO, INC. YOU ARE FURTHER ADVISED THAT AS OF SEPT. 17,1995, ANN SAUCIER AND DEBORAH TAYLOR WERE REMOVED OF ALL OFFICIAL RESPONSIBILITY AND LEGAL AUTHORITY ,IF ANY, (RC1702) TO ACT IN ANY CAPACITY IN BEHALF OF UNITED WE STAND AMERICA-OHIO, INC.

PLEASE BE FURTHER ADVISED THAT THE WRITER AND REQUESTER IS A MEMBER OF UNITED WE STAND AMERICA . PLEASE BE FURTHER ADVISED THE THE LAW FIRM OF ARNEBECK &CHRISTENSEN AND IT MEMBERS WILL BE ACCOUNTABLE IF THE GOOD NAME OF UNITED WE STAND AMERICA SUFFERS ANY SLANDER OR HARM BECAUSE OF YOUR ACTIONS.

RESPECTFULLY

A.L. Coppock
A.L. COPPOCK

CONGRESSIONAL DISTRICT COORDINATOR-TRUSTEE
OF UNITED WE STAND AMERICA-OHIO, INC.

FOR THE 16 TH CONGRESSIONAL DISTRICT. . "

PLEASE SEND: REQUESTED DOCUMENTS TO A.L. COPPOCK
233 HARTER AVE. N.W. CANTON, OHIO 44708 "

97043736

TRUSTEES SIGNED BELOW MOVE THE FEDERAL ELECTION COMMISSION TO DISMISS THE ABOVE CAPTION MATTER FOR THE FOLLOWING REASONS:

1. THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS AUTHORITY AND JURISDICTION TO FILE A COMPLAINT IN BEHALF OF UNITED WE STAND AMERICA- OHIO INC.
2. DEBORA TAYLOR AND M. ANN SAUCIER LACK AUTHORITY TO SIGN ANY DOCUMENTS IN THE NAME OF UNITED WE STAND AMERICA-OHIO INC.
3. THEREFOR THE COMPLAINT STYLED" UNITED WE STAND AMERICA-OHIO INC. VS H. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY,UNITED WE STAND AMERICA INC." DOSE NOT EXIST AND SHOULD BE REMOVED FROM YOUR DOCKET.

RESPECTFUL ADVISED, MOVED AND REQUESTED BY THE MEMBERS OF THE BOARD OF TRUSTEES SIGNED BELOW.

DATE	TRUSTEE	CONGRESSIONAL DISTRICT
12-20-95	Tudee Lee Dunfee	13 th

Approved and signed by a quorum of the board of trustees.
TUDEE DUNFEE SIGNING SEPARATELY, A TRUSTEE OF UNITED WE STAND AMERICA-OHIO INC. PROPERLY ELECTED BY A QUORUM OF THE MEMBERSHIP OF THE 13 TH CONGRESSIONAL DISTRICT

SIGNED IN MY PRESENCE 12/20/95 Tudee Dunfee NOTARY OF THE COUNTY
OF Korain STATE OF OHIO

MY COMMISSION EXPIRES ON DAY 08 MONTH 26 YEAR. 00

TERESSA K. SMITH
Notary Public, State of Ohio
My Commission Expires 8/26/00

97043793737

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dec 28 11 21 AM '95

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL LAWRENCE NOBLE
ROOM 657
999 E. STREET
WASHINGTON, D.C. 20463

RE/ " UNITED WE STAND AMERICA-OHIO INC. VS H. ROSS PEROT, CITIZENS TO
ESTABLISH A REFORM PARTY, UNITED WE STAND AMERICA INC."

DEAR MR. NOBLE:

THE CHAIRMAN OF THE FINANCE COMMITTEE OF UNITED WE STAND AMERICA-OHIO
INC. AND THE NEWSPAPERS HAVE BROUGHT A MATTER TO OUR ATTENTION. THE
MATTER IS THE LAW FIRM OF ARNEBECK & CHRISTENSEN HAS FILED A COMPLAINT
TO YOUR COMMISSION STYLED AS " UNITED WE STAND AMERICA-OHIO, INC. VS H.
ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
AMERICA INC." WITH OUT THE AUTHORIZATION OF THE BOARD OF TRUSTEES OF
UNITED WE STAND-OHIO INC.. THE CODE OF REGULATIONS REQUIRES THE BOARD
OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.'S APPROVAL OF ANY
EXPENSE BEFORE IT IS INCURRED. MR. NOBLE PLEASE BE ADVISED THAT A
QUORUM OF THE BOARD OF TRUSTEES HAS NOT AUTHORIZED ANYONE TO CONTACT
ANY ATTORNEY FOR LEGAL SERVICES, OR WAS ANY MATTER BROUGHT TO THE
BOARD OF TRUSTEES REQUESTING THAT LEGAL SERVICES OF ARNEBECK &
CHRISTENSEN BE ACQUIRED OR OBTAINED. REASONABLE MINDS MUST CONCLUDE
THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN DOES NOT HAVE UNITED WE
STAND AMERICA-OHIO INC. AS A CLIENT.

PLEASE BE ADVISED THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS
AUTHORITY TO ACT AS LEGAL COUNSEL FOR UNITED WE STAND AMERICA-OHIO
INC. FURTHER THE COMPLAINT STYLED " UNITED WE STAND AMERICA-OHIO INC.
VS H. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
AMERICA, INC." SHOULD BE FORTHWITH DISMISSED BECAUSE THE LAW FIRM OF
ARNEBECK & CHRISTENSEN LACK AUTHORITY TO BE LEGAL COUNSEL, POWER OF
ATTORNEY OR AN AGENT OF UNITED WE STAND AMERICA- OHIO INC.

PLEASE BE FURTHER ADVISED: SEPTEMBER 17, 1995 THE BOARD OF TRUSTEES OF
UNITED WE STAND AMERICA-OHIO INC. ELECTED NEW OFFICERS AND IMMEDIATELY
REMOVED ONE DEBORA TAYLOR FROM OFFICE AND REMOVED ONE M. ANN SAUCIER
FROM OFFICE. THEREFOR DEBORA TAYLOR AND M ANN SAUCIER LACK LEGAL
AUTHORITY TO PERFORM ANY LEGAL FUNCTION ON BEHALF OF THE BOARD OF
TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.

MR. NOBLE, IN SIMPLE WORDS YOU DO NOT HAVE A COMPLAINT BECAUSE THE
ATTORNEY HAS NO AUTHORITY TO ACT IN BEHALF OF THE CORPORATION, THE
SIGNATURES OF THE COMPLAINT WERE REMOVED FROM OFFICE AS OF SEPT. 17,
1995 AND HAVE NO AUTHORITY TO ACT IN ANY CAPACITY RELATIVE TO THE
CORPORATION OF UNITED WE STAND AMERICA-OHIO INC..

ATTACHED IS A LETTER SENT TO THE LAW FIRM OF ARNEBECK & CHRISTENSEN BY
CERTIFIED MAIL. article no. P 292 612 047. THE LAW FIRM HAS NOT
RESPONDED WRITTEN REQUEST.

97043793738

November 20, 1995

"Arnebeck & Christensen
65 E. State Street Suite 1000
Columbus, Ohio 4315

ATTENTION: CLIFFORD O. ARNEBECK Jr.

Please be advised that the writer will forth-with file a complaint to the Ohio Supreme Court Disciplinary Counsel unless the following information is instantly provide to the writer.

The information requested is as follows:

1. A copy of the board of trustees resolution of United We Stand America-Ohio Inc. authorizing you to prepare and file a federal elections commission complaint (exhibit A. over your seal) with the secretary of state of Ohio Robert Taft Nov. 20,1995 and the Federal Elections Commission.

2. A copy of the contract signed by any officer of United We Stand America-Ohio Inc. authorizing the law firm of Arnebeck & Christensen to be the attorney for United We Stand America Ohio Inc..

3. Copy of any check for fees bearing the words United We Stand America-Ohio Inc. made payable to the law firm of Arnebeck & Christensen and receipt generated by the above named law firm to show payment for past and/or present and/ or future legal services contracted between the law firm of Arnebeck & Christensen and United We Stand America-Ohio Inc.

4. A copy of the board of trustees resolution of United We Stand-Ohio America Inc. authorizing Ann Saucier and Deborah Taylor to authorize the law firm of ARNEBECK & CHRISTENSEN TO BE THE THE LEGAL COUNSEL OF UNITED WE STAND AMERICA-OHIO, INC .

PLEASE BE ADVISED THAT THE WRITER IS A MEMBER OF THE BOARD OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO, INC. YOU ARE FURTHER ADVISED THAT AS OF SEPT. 17,1995. ANN SAUCIER AND DEBORAH TAYLOR WERE REMOVED OF ALL OFFICIAL RESPONSIBILITY AND LEGAL AUTHORITY ,IF ANY, (RC1702) TO ACT IN ANY CAPACITY IN BEHALF OF UNITED WE STAND AMERICA-OHIO, INC.

PLEASE BE FURTHER ADVISED THAT THE WRITER AND REQUESTER IS A MEMBER OF UNITED WE STAND AMERICA . PLEASE BE FURTHER ADVISED THE THE LAW FIRM OF ARNEBECK &CHRISTENSEN AND IT MEMBERS WILL BE ACCOUNTABLE IF THE GOOD NAME OF UNITED WE STAND AMERICA SUFFERS ANY SLANDER OR HARM BECAUSE OF YOUR ACTIONS.

RESPECTEULLY

A.L. Coppock
A.L. COPPOCK

CONGRESSIONAL DISTRICT COORDINATOR-TRUSTEE
OF UNITED WE STAND AMERICA-OHIO, INC.

FOR THE 16 TH CONGRESSIONAL DISTRICT. . "

PLEASE SEND: REQUESTED DOCUMENTS TO A.L. COPPOCK
233 HARTER AVE. N.W. CANTON, OHIO 44708 "

TRUSTEES SIGNED BELOW MOVE THE FEDERAL ELECTION COMMISSION TO DISMISS THE ABOVE CAPTION MATTER FOR THE FOLLOWING REASONS:

1. THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS AUTHORITY AND JURISDICTION TO FILE A COMPLAINT IN BEHALF OF UNITED WE STAND AMERICA- OHIO INC.
2. DEBORA TAYLOR AND M. ANN SAUCIER LACK AUTHORITY TO SIGN ANY DOCUMENTS IN THE NAME OF UNITED WE STAND AMERICA-OHIO INC.
3. THEREFOR THE COMPLAINT STYLED" UNITED WE STAND AMERICA-OHIO INC. VS H. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY,UNITED WE STAND AMERICA INC." DOSE NOT EXIST AND SHOULD BE REMOVED FROM YOUR DOCKET.

RESPECTFUL ADVISED, MOVED AND REQUESTED BY THE MEMBERS OF THE BOARD OF TRUSTEES SIGNED BELOW.

DATE	TRUSTEE	CONGRESSIONAL DISTRICT
Dec. 10, 1995	J. L. Coppock	16
Dec. 10, 1995	W. I. Gamm	18
Dec. 10, 1995	George F. Marose	14
Dec. 10, 1995	Sal [Signature]	14
Dec. 10, 1995	Alfred A. Spriggin	10
Dec. 10, 1995	Charles Ed Jordan	12
Dec. 10, 1995	John [Signature]	7
Dec. 10, 1995	Dolores L. Long	4

A QUORUM OF THE BOARD OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC

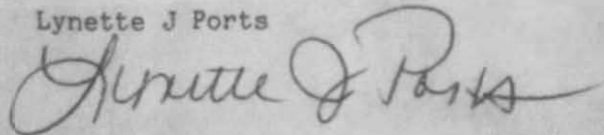

BARBARA BATLOG ACTING SECRETARY

Jim Kazoun, State Coordinator

Before me, a Notary Public, personally appeared the above named Jim Kazoun who acknowledged that he did sign the foregoing instrument and that the same is his free act and deed.
In Testimony Whereof, I have hereunto affixed my name and official seal at Akron Ohio this 11th day of December 1995

Lynette J Ports

My commission
expires Nov 3rd 2000



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JAN 19 3 23 PM '96

Attorneys and Counselors

Writer's Direct Dial Number

Other Offices

Austin
Houston
Fort Worth

January 18, 1996

VIA REGULAR MAIL

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

Attn: Alva E. Smith, Esq.

Re: MUR 4284 - Ross Perot and United We
Stand America, Inc., et al.

Dear Mr. Noble:

This responds to your letter, dated November 30, 1995, notifying Ross Perot, United We Stand America, Inc. ("UWSA"), and Citizens to Establish a Reform Party ("Citizens") of a complaint filed against them by United We Stand America-Ohio, Inc. ("UWSA-OH"), an entity independent of UWSA. This complaint is a long-standing personal and internal dispute between certain disgruntled members of UWSA-OH and the Respondents. Indeed, as demonstrated by the attached letter to the Federal Election Commission ("FEC" or "Commission") from the rightful directors of UWSA-OH, the signatories of the complaint have no authority to speak or take any other action on behalf of UWSA-OH. Moreover, this complaint does not make any sustainable claim under the Federal Election Campaign Act of 1971, as amended ("FECA"). Rather, the complaint merely levels personal allegations such as Mr. Perot selecting a "bogus Board of Directors" for UWSA-OH.

Although the charges in the complaint essentially involve a private struggle among Ohio residents for control of an organization, the complainant does little more than allege that Ross Perot is a candidate for President. Based on that allegation, the complainant charges that Ross Perot improperly funded the cost of Citizens in attempting to obtain ballot access in various states. However, the premise that underlies the legal basis for the complaint, i.e., that Ross Perot is a candidate, is false. Since he is not a candidate, the complaint must be dismissed.

The FECA defines a "contribution" as a payment made to influence an election, i.e., a general, primary, or runoff election, for federal office. 2 U.S.C. §§ 431(1) and (8). The efforts of Citizens have amounted to nothing more than an attempt to obtain ballot status for a party in certain states. In at least two states, Maine and Ohio, state officials have taken the position that Citizens does not qualify for ballot status. Citizens has not decided whether, and may be unable, to run a candidate for federal office, let alone identify a possible candidate or a process through which it will select a candidate.¹ Since Citizens does not have a federal candidate running on its behalf, its activities cannot influence a federal election and therefore, no contribution could have been made under the FECA.

Indeed, the Commission just approved an advisory opinion addressing the status of such ballot access payments under the FECA. FEC AO 1995-45 (January 11, 1996). In that advisory opinion, Dr. John Hagelin's campaign committee made expenditures to obtain a position for him on the ballot of various states by either directly placing the candidate on the ballot or placing the candidate's party, the Natural Law Party, on the ballot.

¹ The complaint essentially alleges that Citizens from its inception intended to run Mr. Perot as its candidate. Citizens and Mr. Perot, however, have made no such decision nor has Mr. Perot's name appeared on a ballot in any state. See attached affidavit.

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The Commission held that such expenditures are qualified campaign expenditures under the FECA only because the expenditures' "principal purpose and outcome relate to obtaining a ballot position for Dr. Hagelin's presidential candidacy." Id. Indeed, the sole reason for securing ballot status for the Natural Law Party was to use a "simpler and more cost effective" method for obtaining a ballot position for Dr. Hagelin. Id.

Ballot access payments under that advisory opinion are considered to be campaign related expenditures or contributions only if they are made for the purpose of placing an identifiable candidate on a ballot. Indeed, every time the Commission has addressed the issue of whether ballot access payments qualify as a campaign expenditure or contribution, there was an identifiable candidate running for office. In this case, however, Citizens has not identified a candidate or even decided whether it will run a candidate.

The Fair Political Practices Commission ("FPPC"), which implements the California state campaign finance laws, also agreed with this analysis when it advised the Citizens to Establish a California Reform Party that funds received by the party to qualify the party for the ballot in California do not influence an election in that there is no identifiable candidate and therefore, do not qualify as contributions under state law. See FPPC letter to Citizens to Establish a California Reform Party (November 8, 1995) (a copy of this letter is attached). The FPPC further concluded that this party did not qualify as a political party committee as long as it limits its activity to getting the party on the ballot. See id.

Also note that without a candidate, Citizens does not qualify as a political committee under the FECA. Indeed, the Commission found that a party would attain political party committee status under the FECA after the Commission received verification "from the appropriate state election official that the name of the [party's] candidate for federal office will appear on that state's ballot." FEC AO 1980-3, Fed. Elec. Camp. Fin. Guide, ¶ 5463 (March 4, 1980); see also FEC AO 1975-129, Fed. Elec. Camp. Fin. Guide, ¶ 5192 (February 3, 1976). Also,

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in FEC AO 1976-95, Fed. Elec. Camp. Fin. Guide, ¶ 5232 (October 28, 1976), the Commission stated that a party would need a candidate to qualify as a national party committee under the FECA.

The Commission has long required a party to have a verified identifiable candidate and procedures for nominating a candidate before granting party committee status. It cannot now say that Citizens is subject to the rules as a party committee even though it does not have a candidate.

Therefore, given that no contribution was made under the FECA because Citizens has no candidate and Citizens limited itself to ballot access activities, the Commission should take no further action in this matter.

Respectfully submitted,

Kim Askew ~~FX~~

Kim Askew

Attachments

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97043793745

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL LAWRENCE NOBLE
ROOM 487
999 P. STREET
WASHINGTON, D.C. 20463

RE/ " UNITED WE STAND AMERICA-OHIO INC. VS M. ROSS PEROT, CITIZENS TO
ESTABLISH A REFORM PARTY, UNITED WE STAND AMERICA INC."

DEAR MR. NOBLE:

THE CHAIRMAN OF THE FINANCE COMMITTEE OF UNITED WE STAND AMERICA-OHIO
INC. AND THE NEWSPAPERS HAVE BROUGHT A MATTER TO OUR ATTENTION. THE
MATTER IS THE LAW FIRM OF ARNEBECK & CHRISTENSEN HAS FILED A COMPLAINT
TO YOUR COMMISSION STYLED AS " UNITED WE STAND AMERICA-OHIO, INC. VS M.
ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
AMERICA INC." WITH OUT THE AUTHORIZATION OF THE BOARD OF TRUSTEES OF
UNITED WE STAND-OHIO INC.. THE CODE OF REGULATIONS REQUIRES THE BOARD
OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.'S APPROVAL OF ANY
EXPENSE BEFORE IT IS INCURRED. MR. NOBLE PLEASE BE ADVISED THAT A
QUORUM OF THE BOARD OF TRUSTEES HAS NOT AUTHORIZED ANYONE TO CONTACT
ANY ATTORNEY FOR LEGAL SERVICES, OR WAS ANY MATTER BROUGHT TO THE
BOARD OF TRUSTEES REQUESTING THAT LEGAL SERVICES OF ARNEBECK &
CHRISTENSEN BE ACQUIRED OR OBTAINED. REASONABLE MINDS MUST CONCLUDE
THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN DOES NOT HAVE UNITED WE
STAND AMERICA-OHIO INC. AS A CLIENT.

PLEASE BE ADVISED THAT THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS
AUTHORITY TO ACT AS LEGAL COUNSEL FOR UNITED WE STAND AMERICA-OHIO
INC. FURTHER THE COMPLAINT STYLED " UNITED WE STAND AMERICA-OHIO INC.
VS M. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND
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ATTORNEY OR AN AGENT OF UNITED WE STAND AMERICA- OHIO INC.

PLEASE BE FURTHER ADVISED: SEPTEMBER 17, 1995 THE BOARD OF TRUSTEES OF
UNITED WE STAND AMERICA-OHIO INC. ELECTED NEW OFFICERS AND IMMEDIATELY
REMOVED ONE DEBORA TAYLOR FROM OFFICE AND REMOVED ONE M. ANN SAUCIER
FROM OFFICE. THEREFOR DEBORA TAYLOR AND M ANN SAUCIER LACK LEGAL
AUTHORITY TO PERFORM ANY LEGAL FUNCTION ON BEHALF OF THE BOARD OF
TRUSTEES OF UNITED WE STAND AMERICA-OHIO INC.

MR. NOBLE, IN SIMPLE WORDS YOU DO NOT HAVE A COMPLAINT BECAUSE THE
ATTORNEY HAS NO AUTHORITY TO ACT IN BEHALF OF THE CORPORATION. THE
SIGNATURES OF THE COMPLAINT WERE REMOVED FROM OFFICE AS OF SEPT. 17,
1995 AND HAVE NO AUTHORITY TO ACT IN ANY CAPACITY RELATIVE TO THE
CORPORATION OF UNITED WE STAND AMERICA-OHIO INC..

ATTACHED IS A LETTER SENT TO THE LAW FIRM OF ARNEBECK & CHRISTENSEN BY
CERTIFIED MAIL. article no. P 292 612 047. THE LAW FIRM HAS NOT
RESPONDED WRITTEN REQUEST.

November 20, 1995

"Arnebeck & Christensen
65 E. State Street Suite 1000
Columbus, Ohio 43115

ATTENTION: CLIFFORD O. ARNEBECK Jr.

Please be advised that the writer will forth-with file a complaint to the Ohio Supreme Court Disciplinary Counsel unless the following information is instantly provide to the writer.

The information requested is as follows:

1. A copy of the board of trustees resolution of United We Stand America-Ohio Inc. authorizing you to prepare and file a federal elections commission complaint (exhibit A. over your seal) with the secretary of state of Ohio Robert Taft Nov. 20,1995 and the Federal Elections Commission.

2. A copy of the contract signed by any officer of United We Stand America-Ohio Inc. authorizing the law firm of Arnebeck & Christensen to be the attorney for United We Stand America Ohio Inc..

3. Copy of any check for fees bearing the words United We Stand America-Ohio Inc. made payable to the law firm of Arnebeck & Christensen and receipt generated by the above named law firm to show payment for past and/or present and/ or future legal services contracted between the law firm of Arnebeck & Christensen and United We Stand America-Ohio Inc.

4. A copy of the board of trustees resolution of United We Stand-Ohio America Inc. authorizing Ann Saucier and Deborah Taylor to authorize the law firm of ARNEBECK & CHRISTENSEN TO BE THE THE LEGAL COUNSEL OF UNITED WE STAND AMERICA-OHIO, INC .

PLEASE BE ADVISED THAT THE WRITER IS A MEMBER OF THE BOARD OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO, INC. YOU ARE FURTHER ADVISED THAT AS OF SEPT. 17,1995. ANN SAUCIER AND DEBORAH TAYLOR WERE REMOVED OF ALL OFFICIAL RESPONSIBILITY AND LEGAL AUTHORITY ,IF ANY, (DC1702) TO ACT IN ANY CAPACITY IN BEHALF OF UNITED WE STAND AMERICA-OHIO, INC.

PLEASE BE FURTHER ADVISED THAT THE WRITER AND REQUESTER IS A MEMBER OF UNITED WE STAND AMERICA . PLEASE BE FURTHER ADVISED THE THE LAW FIRM OF ARNEBECK & CHRISTENSEN AND IT MEMBERS WILL BE ACCOUNTABLE IF THE GOOD NAME OF UNITED WE STAND AMERICA SUFFERS ANY BLANDER OR HARM BECAUSE OF YOUR ACTIONS.

RESPECTFULLY

A.L. COPPOCK
CONGRESSIONAL DISTRICT COORDINATOR-TRUSTEE
OF UNITED WE STAND AMERICA-OHIO, INC.
FOR THE 16 TH CONGRESSIONAL DISTRICT. . "
PLEASE SEND: REQUESTED DOCUMENTS TO A.L. COPPOCK
233 HARTER AVE. N.W. CANTON, OHIO 44708 "

97043793746

TRUSTEES SIGNED BELOW MOVE THE FEDERAL ELECTION COMMISSION TO DISMISS THE ABOVE CAPTION MATTER FOR THE FOLLOWING REASONS:

1. THE LAW FIRM OF ARNEBECK & CHRISTENSEN LACKS AUTHORITY AND JURISDICTION TO FILE A COMPLAINT IN BEHALF OF UNITED WE STAND AMERICA- OHIO INC.
2. DEBORA TAYLOR AND M. ANN SAUCIER LACK AUTHORITY TO SIGN ANY DOCUMENTS IN THE NAME OF UNITED WE STAND AMERICA-OHIO INC.
3. THEREFOR THE COMPLAINT STYLED" UNITED WE STAND AMERICA-OHIO INC. VS H. ROSS PEROT, CITIZENS TO ESTABLISH A REFORM PARTY, UNITED WE STAND AMERICA INC." DOES NOT EXIST AND SHOULD BE REMOVED FROM YOUR DOCKET.

RESPECTFUL ADVISED, MOVED AND REQUESTED BY THE MEMBERS OF THE BOARD OF TRUSTEES SIGNED BELOW.

DATE

TRUSTEE

CONGRESSIONAL DISTRICT

approved and signed by a quorum of the board of trustees over the
a verified signature of Jim Kazou--- A.L. Coppock

SENT CERTIFIED MAIL TO THE F.E.C. ARTICLE NO. D 028-928-704 RETURN
RECEIPT REQUESTED.

A QUORUM OF THE BOARD OF TRUSTEES OF UNITED WE STAND AMERICA-OHIO
INC.

BARBARA/BAYLOR/ACTING/SECRETARY

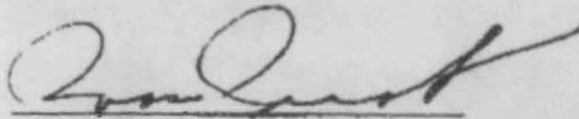
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AFFIDAVIT OF ROSS PEROT

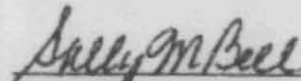
I, ROSS PEROT, being duly sworn, depose and say:

1. I have not decided whether to run for the Presidency of the United States in 1996.

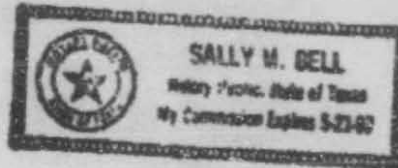


ROSS PEROT

Sworn to before me this 18 day of January, 1996.



Notary Public



RAVI MBHTA
CHAIRMAN



FAIR POLITICAL PRACTICES COMMISSION

November 8, 1995

Matt Sawyer, Esq.
Citizens to Establish a California
Reform Party
7676 LBJ Freeway, Suite 727
Dallas, Texas 75251

Re: Your Request for Advice
Our File No A-95-336

Dear Mr. Sawyer:

You have requested advice concerning the campaign disclosure provisions of the Political Reform Act (the "Act").¹

QUESTION

Will the Citizens to Establish A California Reform Party (CECRP) incur any filing obligations under the Act pursuant to their efforts to qualify the Reform Party of California (RPC) as a political party with ballot access rights in California?

ANSWER

So long as CECRP confines its activities to qualifying the RPC as a political party with ballot access rights in California, it will have no filing obligations under the Act.

¹ Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

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FACTS

You are writing on behalf of CECRP which is receiving and spending money in connection with efforts to qualify the RPC as a political party in California.

ANALYSIS

The campaign disclosure provisions of the Act require candidates and "committees" to file periodic reports disclosing contributions received and expenditures made. (Sections 84100, et seq.) The term "committee" includes a person or organization that receives contributions totaling \$1,000 or more in a calendar year. (Section 82013(a).)

The term "contribution" is defined in Section 82015 as a payment made for political purposes. A payment is made for political purposes if it is:

- 1) For the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate or candidates, or the qualification or passage of any measure; or
- 2) Received by or made at the behest of the following or any agent thereof:
 - A) a candidate;
 - B) a controlled committee;
 - C) an official committee of a political party, including a state central committee, county central committee, assembly district committee or any subcommittee of such committee; or
 - D) An organization formed or existing primarily for political purposes, including, but not limited to, a political action committee established by any membership organization, labor union or corporation....

(Regulation 18215
[emphasis added].)

The CECRP is not yet a political party; thus, funds received and expenditures made to qualify the RPC for the California ballot are not considered to be made for "political purposes". Therefore, CECRP has no reporting obligations in connection with its attempt to qualify as a political party. (Griffiths Advice Letter, No. A-83-248.)

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Sawyer, Matt
Our File No. 95-336
Page 3

If you have additional questions, please contact me at (916)
322-5662.

Sincerely,

Steven G. Churchwell
General Counsel

Wayne Imberi

By: Wayne P. Imberi
Political Reform Consultant

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ARNEBECK & CHRISTENSEN

65 E. STATE ST., SUITE 1000
COLUMBUS, OHIO 43215
614-460-3524
FAX: 614-461-7511

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

FEB 12 11 57 AM '96

February 8, 1996

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

RE: MUR 4284

Dear Mr. Noble:

We thought you should be aware of the attached documents in regard to the matters currently under review by the Federal Election Commission and the Ohio Secretary of State.

Mr. Verney, who alternates between being the national head of the "Reform Party" and Executive Director of United We Stand America, Inc., but who in either capacity reports directly to Ross Perot, has ordered by way of the attached certified letter that United We Stand America-Ohio, Inc. discontinue its use of its name.

The response of the Ohio corporate group by way of a news release is attached.

This action appears to be in reprisal against UWSA-OH for playing a watchdog function against Mr. Perot, by bringing to the attention of state and federal authorities apparent violations of state and federal election laws by those reporting to Mr. Perot in his various partisan political endeavors.

Sincerely yours,

Clifford O. Arnebeck, Jr.

Clifford O. Arnebeck, Jr.
Attorney for United We Stand America-Ohio, Inc.

SWORN and subscribed before me this 8th day of February 1996.



RICHARD M. GREENBERG
Notary Public, State of Ohio
My Commission Expires 3/26/2000

Richard M. Greenberg
Notary Public



UNITED WE STAND AMERICA, SM

7616 LBJ Freeway, Suite 727
Dallas, Texas 75251

Russell J. Verney
(214) 450-8800 office
(214) 450-8821 fax

January 30, 1996

Jim Kazoun
State Coordinator
United We Stand America - Ohio, Inc.
965 E. Archwood Ave.
Akron, OH 44306

Deborah Taylor
5500 Market Street, #92
Youngstown, OH 44512

Dear Mr. Kazoun and Ms. Taylor:

It is unfortunate, Mr. Kazoun, that your efforts to build a better future for the citizens of our nation have been obstructed by elements from within the Ohio organization. And though it is the request of numerous United We Stand America - Ohio, Inc. members that I cancel the licensing agreement between it and United We Stand America so as to deprive these elements of the ability to mask their words and acts under the name United We Stand America, it is only with the deepest regret that I accede.

As a dispute exists as to who rightfully governs the United We Stand America - Ohio, Inc. organization, I am also addressing a copy of this letter to Ms. Deborah Taylor, who has made some claims to be the Chairperson of United We Stand America - Ohio, Inc., to guard against the possibility that she or anyone else might assert the following cancellation is ineffective on the grounds that she was not provided written notice.

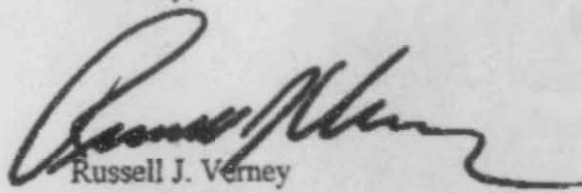
To this end, I hereby notify United We Stand America - Ohio, Inc. that the licensing agreement dated January 11, 1993 granting that organization rights to the name "United We Stand America" is canceled, as per its terms and our right, effective fourteen days after receipt of this letter at the above listed address. Accordingly, United We Stand America - Ohio, Inc. must immediately thereafter discontinue use of "United We Stand America" and "UWSA", and any name or mark similar thereto; must delete "United We Stand America", "UWSA", and all derivations thereof from its trade name and corporate name; and take whatever other actions may be necessary to insure that all rights in these names and marks and the goodwill associated therewith shall remain

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the property of United We Stand America, Inc. Accordingly, from fourteen days after the receipt of this letter at the above listed address, there will be no persons entitled to use United We Stand America - OH, Inc. or UWSA - OH, Inc. or any name or mark similar thereto in representing themselves or their organization.

However, Mr. Kazoun, should you or any other member, feel in the future, that the dissension within the Ohio organization has been resolved, please contact me for discussion if you then desire reactivation of our licensing arrangement.

Sincerely,



Russell J. Verney
Executive Director
United We Stand America, Inc.

cc: Ernie Roush
Dolores Sorg
Jody Bishop-Smith
Jane Conrad
Arthur Henry IV
Diane Davison
Ed Jordan
Tudee Dunfee
Frank Reed
Al Coppock
W. Ira Gann
Barbara Balog
Roberta Reece
Mick Torok
Jeanette Ortman
Deanna Clapsadle
Tom Clapsadle
Ray Mathias
Ken Davison
Diane Davison
Mary Anne Saucier
Al Montag
Ed Stanek
Gary Yagley
Fred D'Amato

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UNITED WE STAND AMERICA-OHIO, INC.**FOR IMMEDIATE RELEASE****Date: February 7, 1996****Contacts: Deborah Taylor, Chair
Phone: 216-788-6508****Anne Saucier, Secretary
Phones: 614-442-7645 or 614-457-4353****ROSS PEROT THREATENS OHIO'S
UNITED WE STAND AMERICA**

Columbus, Ohio - Ross Perot has ordered Ohio's United We Stand America to stop using the name "United We Stand America-Ohio, Inc." The move follows complaints filed by the Ohio group to the Federal Elections Commission and to the Ohio Secretary of State regarding Reform Party election irregularities.

On February 4, THE COLUMBUS DISPATCH reported that a grand jury had issued subpoenas "for information from the Reform Party and others connected with the drive." The FEC has informed UWSA-OHIO, Inc. that they are proceeding with an investigation.

"When we would not go along with Mr. Perot's plan to convert UWSA into a new party as a vehicle for his '96 presidential campaign, his paid staff tried to create a new puppet board and seize all the assets of the corporation," said Deborah Taylor, chairperson of the Ohio Corporation. "That failed, and now he is trying to take our name," she said.

"He is trying to punish and intimidate us for having the courage to suggest that he and his paid staff should follow the same laws and ethical behavior that apply to everyone else," said Anne Saucier, Secretary of the Ohio organization.

"Mr. Perot told American citizens, including those represented by Deborah Taylor and Anne Saucier, that UWSA would belong to them. It appears an Ohio Court may soon have the opportunity to decide whether Perot or the Ohio volunteers of UWSA-Ohio, Inc. have acted in good faith," said attorney Cliff Arnebeck.

ARNEBECK & CHRISTENSEN
65 E. STATE ST., SUITE 1000
COLUMBUS, OH 43215
614-460-3524
FAX: 614-464-1466

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAR 25 2 56 PM '96

March 19, 1996

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

RE: MUR 4284

Dear Mr. Noble:

The complaint filed in the above referenced matter described the systematic effort by Mr. Perot to undermine the independence and, if necessary existence, of the state United We Stand corporations. This included a description of the creation of a duplicate puppet board of United We Stand America-Ohio, Inc. in September 1995 for the purpose of endorsing the formation in Ohio of a "Reform Party." We understand that a member of the puppet duplicate board also sought to withdraw the FEC complaint filed by the legitimate nonpartisan corporation. In addition, UWSA, Inc. has sought to revoke the licence of UWSA-OH, Inc. to use the name UWSA, although when confronted, Mr. Perot reportedly denied he had directed such action.

Subsequent to the filing of a complaint with the FEC, Deborah Taylor and Anne Saucier in their respective capacities as Chair and Secretary of UWSA-Ohio, Inc. requested the Ohio Secretary of State to investigate what appeared to be a pattern of irregularities in the gathering of petitions for the establishment of a "Reform Party." The Ohio Secretary of State promptly referred this to two county boards of elections which, with the assistance of the County Sheriff's, conducted investigations. The Secretary of State announced that evidence of election falsification had been found and the matter has been referred to the County Prosecutor.

We subsequently have requested that the Secretary of State's investigation be broadened to include other counties in which out-of-state staff reporting to Mr. Perot were stationed during the petition gathering effort in Ohio. The irregularities seemed to consist for the most part of Ohio residents signing as circulators of petitions that may have been circulated by out-of-state paid staff.

Enclosed is a pleading filed at the behest of Mr. Perot's Dallas law firm seeking the permission of the Franklin County Court to issue subpoenas and take depositions of Ms. Taylor, Ms. Saucier and myself. Mr. Coppock, the nominal petitioner, is a member of the duplicate board created by Mr. Perot's paid staff, and prior to that time was involved in efforts to disrupt meetings, and had been dismissed from the legitimate corporate organization.

While this action purports to seek information regarding the possible misuse of funds of UWSA-OH, Inc., it is, in our view a blatant attempt to silence through the intimidation

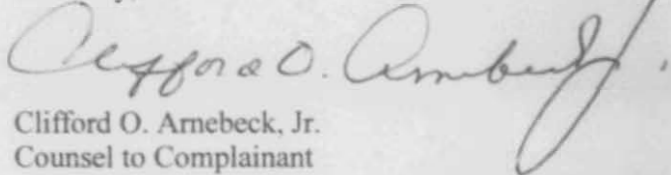
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of legal process Ms. Taylor and Ms. Saucier in the exercise of their responsibilities as corporate officers and public spirited citizens as Mr. Perot proceeds with his 1996 campaign for the Presidency of the United States. Because Ms. Taylor and Ms. Saucier have appeared in national news reports as critics of Perot, the threat to them of having to face the major law firms hired by a billionaire is obviously intended as an example which will intimidate and silence other critics of Mr. Perot, particularly those who came to know of his methods through their volunteer involvement with UWSA.

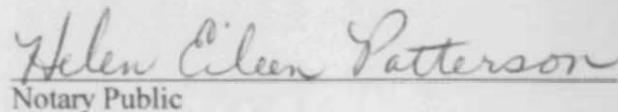
The alleged misuse of funds relates to Ms. Taylor and Ms. Saucier obtaining legal counsel for the purpose of assisting them in bringing facts to the attention of the FEC and the Ohio Secretary of State. Both offices, we understand, have found further investigation to be in the public interest. Disclosures of financial information have been made to the members of the UWSA-Ohio, Inc. board. There has been a reluctance to make information available to those who have joined the duplicate board, because of their apparent objective, consistent with the policy of national UWSA, Inc. board to convert all the assets of UWSA and all state UWSA organizations to the Reform Party.

Please let us know if we may provide any further information to you. All provided here is upon information and belief as supported by the enclosure. The actions of the Ohio authorities have been publicly reported in the press. If the Commission does not monitor the applicable news reports, please advise and we will send you copies of the reports from *The Columbus Dispatch* which has kept abreast and reported all pertinent developments in this matter.

Sincerely,


Clifford O. Arnebeck, Jr.
Counsel to Complainant

Sworn and subscribed this 19th day of March 1996.


Notary Public

Enclosures

cc: Deborah Taylor
Anne Saucier



HELEN EILEEN PATTERSON
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires Mar. 22, 1998

97043793757

IN THE COURT OF COMMON PLEAS
OF FRANKLIN COUNTY, OHIO

A.L. COPPOCK
c/o Mark A. Vander Laan
DINSMORE & SHOHL
1900 Chemed Center
255 East Fifth Street
Cincinnati, OH 45202,

Petitioner,

vs.

DEBBIE TAYLOR
43 Withers Drive
Youngstown, OH 44512

and

FRANK REED
2303 Buckley Road
Columbus, OH 43220

and

ED JORDAN
2809 Bellevue Avenue
Columbus, OH 43207

and

ANNE SAUCIER
3030 North Star Road
Columbus, OH 43221

CASE NO. _____

96MS 03-74

97043793758

and §
§
CLIFFORD O. ARNEBECK, JR. §
65 E. State Street, Suite 1000 §
Columbus, OH 43215, §
§
Respondents. §

PETITION TO PERPETUATE TESTIMONY

Petitioner, A.L. Coppock ("Coppock"), in support of his Petition to Perpetuate Testimony ("Petition"), alleges as follows:

1. Coppock, an officer and director of a non-profit corporation f/k/a United We Stand America - Ohio ("UWSA-Ohio") may be a party plaintiff to an action or proceeding cognizable in an Ohio state court against certain former officers and directors (and their representatives) of UWSA-Ohio, Debbie Taylor ("Taylor"), Frank Reed ("Reed"), Ed Jordan ("Jordan"), Anne Saucier ("Saucier"), and Clifford O. Arnebeck, Jr. ("Arnebeck") (collectively "Respondents").

PARTIES

2. Coppock is a resident of Canton, Ohio.
3. Taylor is a resident of Mahoning County, Ohio and may be served with process at 43 Withers Dr., Youngstown, Ohio.
4. Reed is a resident of Franklin County, Ohio and may be served with process at 2303 Buckley Rd., Columbus, Ohio.

5. Jordan is a resident of Franklin County, Ohio and may be served with process at 2809 Bellavia Ave., Columbus, Ohio.

6. Saucier is a resident of Franklin County, Ohio and may be served with process at 3030 North Star Rd., Columbus, Ohio.

7. Arnebeck is a resident of Franklin County, Ohio and may be served with process at 65 E. State Street, Suite 1000, Columbus, Ohio.

JURISDICTION AND VENUE

8. Jurisdiction and venue are appropriate in this Court pursuant to Rule 27 of the Ohio Rules of Civil Procedure in that this county is the county of the residence of one of the expected adverse parties.

BASIS OF ACTION TO PERPETUATE TESTIMONY

9. Respondents (except Arnebeck)¹ were former officers and directors of UWSA-Ohio, who were at all relevant times in control of the books and records of UWSA-Ohio. Upon information and belief, Coppock believes that at least one of Respondents may have converted UWSA-Ohio funds for their own personal use, or at the very least, a use contrary to the interests of UWSA-Ohio.

¹

Upon information and belief, Arnebeck has acted as legal counsel for UWSA-Ohio without authorization from that organization.

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10. In particular, in March 1995, Jordan was the Treasurer of UWSA-Ohio. At that time, he notified Taylor, then the State Coordinator of UWSA-Ohio, that he was resigning as Treasurer because of the failure of Taylor and her supporters to follow proper accounting standards regarding the reimbursement of expenses incurred on behalf of UWSA-Ohio. At that point, upon information and belief, Taylor and Saucier obtained possession and control over the books and records of UWSA-Ohio.

11. On September 17, 1995, Taylor was voted out as State Coordinator and as a Board Member of the Board of Directors of UWSA-Ohio. UWSA-Ohio requested that Taylor turn over the UWSA-Ohio books and records, but Taylor refused to do so.

12. Upon information and belief, on or about September 18, 1995, without authorization, Taylor and/or Saucier illegally and improperly removed approximately \$5,000 from a UWSA-Ohio bank account in Columbus, Ohio. Reed has indicated that he has knowledge of these activities.

13. Subsequently, in September 1995, Jordan again became Treasurer of UWSA-Ohio. Despite UWSA-Ohio's repeated demands that Taylor turn over the books and records of UWSA-Ohio, Taylor failed to do so.

14. Among other improper and unauthorized activities, it is believed that Taylor and Saucier illegally used UWSA-Ohio funds to retain Arnebeck, an attorney, to take legal action, purportedly on behalf of UWSA-Ohio.

15. Arnebeck, took legal action, purportedly on behalf of UWSA-Ohio when he knew he had no authority to do so. UWSA-Ohio did not retain Arnebeck and has told him by written notice that he is not acting on its behalf.

16. As a result, on November 20, 1995, Coppock demanded that Arnebeck turn over all documents authorizing him to take such legal actions and evidencing any funds he improperly received from UWSA-Ohio. A true and correct copy of that letter is attached as Exhibit A. Arnebeck has failed to respond to this demand.

17. Further, pursuant to section 1702.15 of the Ohio Non-Profit Corporation Law, on February 13, 1996, Coppock formally demanded that the remaining Respondents produce the books and records of UWSA-Ohio that are in Respondents' control or possession. True and correct copies of these demand letters are attached as Exhibits B-E. Respondents have failed to comply with Coppock's lawful request or otherwise respond to these letters. A review of these books and records and the testimony of Respondents will establish whether or not Coppock has a cause of action, individually or on behalf of UWSA-Ohio, against one or all of the Respondents for conversion, breach of fiduciary duty, an accounting or other causes of action related to the Respondents possible unlawful misappropriation of the funds of UWSA-Ohio. As such, Coppock may be a party to an action or proceeding cognizable in this Court against one or all of the Respondents.

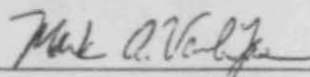
18. At this point, because Respondents have not complied with their obligation to allow Coppock as an officer, director and member of UWSA-Ohio to review the books and records of UWSA-Ohio that are in Respondents' control, Coppock and his legal counsel do not

want to affront Rule 11 of the Ohio Rules of Civil Procedure by bringing an action before he has had an opportunity to obtain the books and records and elicit Respondents' testimony.

19. Coppock desires to perpetuate this testimony to prevent these books and records, and the testimony of Respondents, from being lost through the lapse of time.

WHEREFORE, Coppock prays for an order of this Court (1) authorizing him to take the depositions of Debbie Taylor, Frank Reed, Ed Jordan, Anne Saucier, and Clifford O. Arnebeck, Jr. for the purpose of perpetuating their testimony; (2) authorizing him to subpoena the books and records in Respondents' possession or control that relate in any way to UWSA-Ohio, including but not limited to UWSA-Ohio bank statements, any accounting of expenses incurred by UWSA-Ohio while Respondents were in the possession or control of the books and records of UWSA-Ohio, and all canceled checks and deposit slips from any UWSA-Ohio bank accounts; and (3) grant Coppock any other relief that the Court deems appropriate.

Respectfully submitted,



Mark A. Vander Laan (0013297)

DINSMORE & SHOHL

1900 Chemed Center

255 E. 5th Street

Cincinnati, OH 45202-3172

(513) 977-8238

(513) 977-8505 FAX

OF COUNSEL:

Joel S. Taylor (0019572)

DINSMORE & SHOHL

NDB Bank Building

175 South Third Street, 10th Floor

Columbus, OH 43215-5134

(614) 224-7887

(614) 224-7882 (FAX)

97043793763

HUGHES & LUCE, L.L.P.

Kim J. Askew

Craig W. Budner

1717 Main Street, Suite 2800

Dallas, Texas 75201

(214) 939-5500

(214) 939-6100 FAX

97043793764

THE COURT OF COMMON PLEAS
OF FRANKLIN COUNTY, OHIO

A.L. COPPOCK,

Petitioner.

vs.

DEBBIE TAYLOR, et al.,

Respondents.

§
§
§
§
§
§
§
§

CASE NO. _____

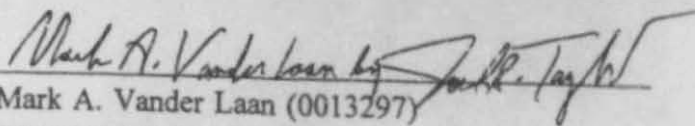
96MS 03-743

NOTICE OF HEARING

97043793765
You are hereby notified that A.L. Coppock, Petitioner in the above entitled action, will apply to the Court of Common Pleas of Franklin County, Ohio, Franklin County Court House, Hall of Justice, 369 S. High Street, Columbus, Ohio 43215 on 29 Day of April at 9:00 a.m. o'clock for an order authorizing USWA to take the depositions of Debbie Taylor, Frank Reed, Ed Jordan, Anne Saucier, and Clifford O. Arnebeck, Jr. whose addresses are set forth in Coppock's Petition, for the purpose of perpetuating their testimony to be used in an expected action or proceeding as described in the Petition, a copy of which is attached. You are invited to be present at the time and place designated above, either in person or by counsel, to be heard or to object to the allowance of the Petition.

97043793766

Respectfully submitted,


Mark A. Vander Laan (0013297)

DINSMORE & SHOHL
1900 Chemed Center
255 E. 5th Street
Cincinnati, OH 45202-3172
(513) 977-8238
(513) 977-8505 FAX

OF COUNSEL:

Joel S. Taylor (0019572)
DINSMORE & SHOHL
NDB Bank Building
175 South Third Street, 10th Floor
Columbus, OH 43215-5134
(614) 224-7887
(614) 224-7882 (FAX)

HUGHES & LUCE, L.L.P.

Kim J. Askew
Craig W. Budner
1717 Main Street, Suite 2800
Dallas, Texas 75201
(214) 939-5500
(214) 939-6100 FAX

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Notice of Hearing and Petition were sent this 15th day of March, 1996 to the following via U.S. Certified Mail:

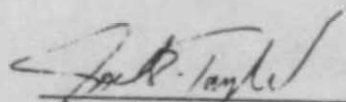
Debbie Taylor
43 Withers Drive
Youngstown, OH 44512

Anne Saucier
3030 N. Star Road
Columbus OH 43221

Frank Reed
2303 Buckley Road
Columbus, OH 43220

Clifford Arnebeck, Jr.
65 E. State Street, Suite 1000
Columbus OH 43215

Ed Jordan
2809 Bellevue Avenue
Columbus, OH 43207



Joel S. Taylor

97043793767



Dr. Robert C. Cella
3886 Melro Rd.
Columbus, OH 43226-0402

TO GENERAL COUNSEL
FEDERAL ELECTIONS
COMMISSION

June 9, 1996

RE: MUR 4284 & AOR 1996-22
ROSS PEROT'S REQUEST
FOR \$30 million dollars
OF TAXPAYERS MONEY

Dear Commissioners

LAST NOVEMBER, 1995 UNITED
WE STAND AMERICA - OHIO, INC.
(UWSA-OHIO) ^{FILED} THE ABOVE NAMED
COMPLAINT WHICH YOU HAVE NOT
RESPONDED TO DATE.

UWSA-OHIO WAS FORMED TO
BE NON-PARTISAN. ROSS PEROT
IS USING ALL UWSA-ASSETS TO
FORM A THIRD PARTY.

I UNDERSTAND THAT ANOTHER
COMPLAINT HAS JUST BEEN FILED
FROM NEW YORK CONCERNING PEROT'S
REQUEST FOR MONEY.

YOU NEEDED TO RESOLVE THE OHIO
COMPLAINT BEFORE HANDING OVER
THIS MONEY TO ROSS PEROT &
THE THIRD PARTY.

A VERY CONCERNED CITIZEN.

Robert C. Cella

97043793768



United We Stand America-Ohio, Inc.
5500 Market Street, Suite 92
Youngstown, Ohio 44512
(330) 788-6508

June 10, 1996

Ms. Lee Ann Elliot, Chairman
Federal Elections Commission
999 E Street N.W.
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 10 9 25 AM '96

Re: Draft Advisory #1996-22 and MUR 4284

Dear Ms. Elliot:

As the current Chairman of United We Stand America-Ohio, Inc. and an active volunteer leader in the Perot '92 campaign, I concur 100% with Mr. Herb Rosenberg's position regarding allotting taxpayer money to Ross Perot and his so-called "Reform Party." I urge the Commission to reject any and all requests by Ross Perot and/or the "Reform Party" for taxpayer dollars.

The Perot '92 campaign was about volunteers who donated time, money and effort to get *an individual* elected who promised to fund "a world class campaign" without taxpayer dollars. The only connection between the "Reform Party" and the Perot '92 campaign is Ross Perot and those on his payroll. The "Reform Party" is not a real party with a platform, committees or contributors but merely a vehicle, similar to those used in 1992, to facilitate Mr. Perot obtaining ballot access (and now obviously taxpayer dollars) in order to run for President of the United States. The reports already submitted to your commission by the Perot Reform Committee and their actions more than validate this assertion. Below are listed a few examples:

1. There is only one contributor to the so-called "Reform Party". There are no contributions from even one other person listed. It takes a real stretch of the imagination to conclude this is the development of a legitimate party **without even one in-kind or monetary contribution** of more than \$200 from one other individual other than Ross Perot. The logical conclusion is that either the reports are not valid or indeed this is a one-man show.
2. The staff of the "Reform Party" is almost identical to the non-profit UWSA and has been and continues to be answerable only to Perot. This staff has been engaged in questionable activity to establish this party. In the state of Ohio, over 700 petition signatures gathered by paid staff were invalidated due to "evidence of election falsification" found in two investigations instigated by Secretary of State Bob Taft.

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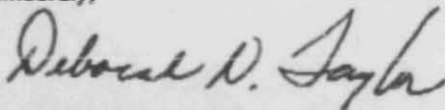
3. According to news reports, the "Reform Party" stopped their attempt to gain ballot access in Texas for the party in order to pursue a petition effort that put Ross Perot on the ballot as an independent candidate. Election officials in Texas were quoted as saying that this independent status is non-transferable. This action shows intent to only run Perot. The question then comes to mind (especially considering all the Texas expenditures listed in their FEC report) -- is the "Reform Party" funding the petition drive which placed Mr. Perot on the ballot as an independent? Why is a legitimate political party engaged in such activities before this "party" picks its candidate at their "convention"?

There are many contradictions in statements made by Mr. Perot to the general public and to the FEC in his request for funding. Many of these questions caused UWSA-Ohio Inc. in November 1995, to file a complaint with the FEC (case # MUR 4284) requesting an investigation into the funding of the "Reform Party." We strongly request that before even ONE DOLLAR of public funds is granted to Mr. Perot and his alleged "party," our complaint be thoroughly investigated and resolved. Resolution of this complaint could answer many of the questions addressed by Mr. Rosenberg and our organization, and help the FEC in determining the status of the "Reform Party."

In these days of limited federal dollars and the demand for increased accountability, it is in the best interest of the taxpayers of this country for the Federal Elections Commission not to grant funds to a party that isn't a party. If they do, it could leave the door open to others who will use the system for personal gain and not for the good of this country.

Thank you.

Sincerely,



Deborah N. Taylor, Chairman
United We Stand America-Ohio, Inc.

9704379377C

Thomas F Linder
11849 Edgewater Dr Apt 104
Lakewood OH 44107-1791

June 10, 1996

BY FAX TRANSMISSION

Ms. Lee Ann Elliot, Chairman
Federal Elections Committee
999 E Street N.W.
Washington, D.C. 20463

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

References: (1) Complaint MUR 4284 November, 1995.
(2) Draft Advisory AOR 1996-22 April, 1996
a Ross Perot request for \$30 million in
Political Party Election Funds.

Dear Ms. Elliott:

Reference cases noted above have been chronicled from their
inceptions up to now by the printed and electronic media.

There is considerable conjecture over the credibility and a
perception of foot-dragging on the part of the FEC in making
a finding for MUR 4284, especially in the face of accelerated
action for AOR 1996-22. And maybe, a perception of special
favor accorded to great wealth and influential law firms.

So much so that your commission has delayed AOR 1996-22 to
hold a public hearing this coming Thursday.

Because I would be unable to attend that hearing, this Fax
message is offered as input to the hearing.

There should be no finding for AOR 1996-22 until ALL OF THE
CLAIMS in MUR 4284 have been investigated by the FEC and the
necessary rulings made and published. Lay the doubts to rest!

The great and costly, apparently fraudulent efforts made in
my State of Ohio by the so-called "Reform Party" to get on
the November ballot have been well-publicized. There is no
such party recognized by the FEC national party list! Nor a
U.S. Presidential candidate. The "party" touts a convention
for such purposes this Fall just prior to the election.

It is reported that "Reform Party" people threatened, to his
face, to sue Ohio's Secretary of State if he didn't back off
on election fraud investigations by county prosecutors, and
he apparently did. Question: The FEC, too? We do wonder.

From what has been published, MUR 4284 fairly well spells out
the facts that the self-styled "Reform Party" is itself under
a cloud, and alleged to have tried looting funds and property
from the erstwhile United We Stand America, Inc. movement, a
non-profit organization. MUR 4284 contains more informaton.

PLEASE SETTLE MUR 4284 BEFORE PROCEEDING ON AOR 1996-22

Tom Linder

97043793771

Karen L. Kelly

5910 RETTIG LANE

CINCINNATI, OHIO 45243

TEL. 513-271-0729 FAX 513-271-2302

MEMORANDUM
(Public Comment)

TO : Lawrence M. Noble, Esq. - General Counsel
Federal Election Commission

FROM : Karen L. Kelly *Karen Kelly*

RE : Consideration of #MUR 4284

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUN 17 9 48 AM '95

There are many thousands of people who know that Ross Perot is not what he claims to be. His desire to set up a third party should be delayed until all matters concerning his use of people who had worked in his **United We Stand America, Inc.** organization to initiate and form the Reform party. People were misled and used to further his ultimate goal for a third party.

A thorough investigation should be initiated. Interviews with former **United We Stand, America, Inc.** volunteers and elected officials should take place. And, the question should be asked of others who were "removed" if they had to sign a disclaimer that would prevent them from saying anything against Perot or **United We Stand, America, Inc.** and how they and **UWSA, Inc.** was used to start a third party.

Please consider **MUR 4284** which was filed by **UWSA-Ohio, Inc.** and received Nov. 22, 1995.

Also, are you a Yale graduate? My husband is William Cody Kelly '44. Just wondered.

Many thanks!

97043793772

Arnebeck & Christensen

65 E. State St., Suite 1000
Columbus, Ohio 43215
614-460-3524
Fax: 614-464-1466

RECEIVED
FEDERAL ELECTION
COMMISSION
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July 2, 1996

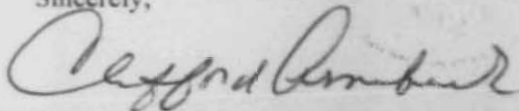
RE: MUR 428

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

Please find enclosed a document reflecting the transfer of assets, namely the goodwill, mailing list and telephone numbers, of the UWSA, Inc. to Ross Perot's 1996 presidential campaign, a.k.a. the Reform Party, a.k.a. The Perot Reform Cmte.

This information was received by the UWSA-OH, Inc. Secretary from a UWSA member in California.

Sincerely,

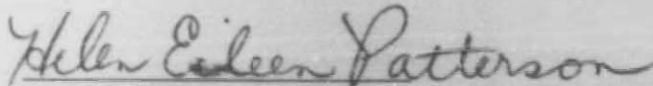


Clifford Arnebeck

State of Ohio

County of Franklin

Sworn and subscribed before me this 2 day of July 1996.



Notary Public

cc: Anne Saucier



HELEN EILEEN PATTERSON
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires Mar. 22, 1998

RECEIVED
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OFFICE OF GENERAL
COUNSEL

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FAX #96-049 page 1 of 1

IMPORTANT MESSAGE!!!

THE UNITED WE STAND AMERICA STATE OFFICE, ALONG WITH THE PHONE LINES AND MAIL DELIVERY, HAS SWITCHED OVER TO THE REFORM PARTY OF CALIFORNIA EFFECTIVE WEDNESDAY, 15 MAY.

THE EFFECT THIS WILL HAVE ON MANY OF YOU IS THAT INFORMATION ON THE REFORM PARTY CAN ONLY BE ACCESSED AND RECEIVED THROUGH THE *REFORM PARTY INFORMATION NETWORK*.

IN ORDER FOR YOU, THE RECEIPT OF THIS FAX, TO CONTINUE TO RECEIVE UPDATES AND INFORMATION ON THE REFORM PARTY, YOU MUST FILL OUT AND SEND IN THE FOLLOWING FORM.

REFORM INFORMATION NETWORK

For Registered Reform Party Members

Please put me on the Reform Information Network. I want to be kept informed of Reform Party activities.

☐ It is OK to notify me of Reform Party activities on an Automated Phone Calling system. (We can only call you by this automated system with your permission.)

Name _____ Address _____
City _____ Zip _____
Telephone _____ Best way to reach me is by:
Alt. Phone _____ ☐ Telephone
Fax _____ ☐ Fax ☐ Mail
E-Mail _____ ☐ E-Mail ☐ Other (explain)

Please consider me an:

_____ Active Member _____ Interested Member _____ Point of Contact (P.C.)

(To be a P.C., there will be some minimum requirements. You will be contacted to review the P.C. program by a Reform Party member).

FAX SIGN UP ONLY (310)826-5227
Reform Party of California
(310)826-5224
11677 National Blvd Los Angeles 90064

MAY-28-1996 10:55
05/27/1996 10:12

UWSA OHIO SECRETARY
CLIFFORD

4817511 P.05
PAGE 0A

To: Linda Clifford

From: UWSA CA (310) 826-5227

3-24-96 2:28pm p. 1 of 1

FAX #96-080 page 1 of 1

5/23/96

To: UWSA Team
Fm: Platt Thompson

To pre-register for COMPLIMENTARY tickets to the Reform Party June 1
Conference, featuring Ross Perot and Gov. Dick Lamm, at the L.A.
Convention center:

call 310-826-5224

We are keeping an accurate count for seating. By pre-registering there will
be a name tag and info packet for you at the door.

97043793775



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

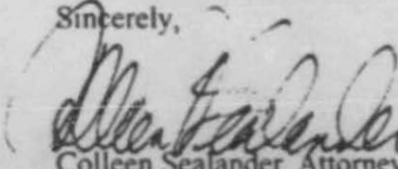
Clifford Arnebeck
Arnebeck & Christensen
65 E. State Street, Suite 1000
Columbus, OH 43215

RE: MUR 4284

Dear Mr. Arnebeck:

This letter acknowledges receipt of two supplements and an amendment to the complaint you filed on November 22, 1995. The respondent(s) will be sent copies of this additional information. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,


Colleen Sealander, Attorney
Central Enforcement Docket

cc: M. Anne Saucier
Deborah Taylor

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793776



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Michael Farris, Chairman
Reform Party of California
11677 National Blvd., Suite 1996
Las Angeles, CA 90064

RE: MUR 4284

Dear Mr. Farris:

On July 9, 1996, the Federal Election Commission received an amendment to a complaint which indicates that the Reform Party of California may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the original complaint and amendment is enclosed. Also enclosed are supplements to the complaint. We have numbered this matter MUR 4284. 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 Reform Party of California 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.

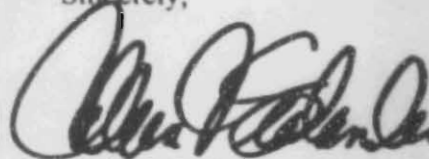
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

97043793777

Michael Farris
Page 2

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,



Colleen Sealander, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Amendment
3. Supplements
4. Procedures
5. Designation of Counsel Statement

97043793778



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Chairman
United We Stand America-CA
11677 National Blvd., Suite 1996
Las Angeles, CA 90064

RE: MUR 4284

Dear Sir or Madam:

On July 9, 1996, the Federal Election Commission received an amendment to a complaint which indicates that United We Stand America-CA may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the original complaint and amendment is enclosed. Also enclosed are supplements to the complaint. We have numbered this matter MUR 4284. 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 United We Stand America-CA 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

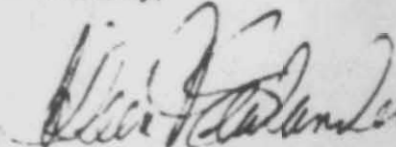
YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793779

Chairman
Page 2

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,



Colleen Sealander, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Amendment
3. Supplements
4. Procedures
5. Designation of Counsel Statement

97043793780



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Norris Clark, Executive Director
United We Stand America-NJ
100 Metroplex, #202
Edison, NJ 08817

MUR: 4284

Dear Mr. Clark:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793781



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Wade Habshey, Executive Director
United We Stand America-IN
11216 Harrington Lane
Fishers, IN 46038

MUR: 4284

Dear Mr. Habshey:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793782



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Richard Taylor, Executive Director
United We Stand America-GA
1380 W. Paces Ferry Road, N.W.
Atlanta, GA 30327

MUR: 4284

Dear Mr. Taylor:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793783



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Ralph Perkins
North Central Regional Director-UWSA
70416 Wolcott
Armada, MI 48005

MUR: 4284

Dear Mr. Perkins:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793784



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1996

Robert and Mildred Fischer
2410 SR 222 South
New Richmond, OH 45157

MUR: 4284

Dear Mr. and Mrs. Fischer:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Conleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793785



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Kim Askew, Esq.
HUGHES & LUCE, L.L.P.
1717 Main Street
Suite 2800
Dallas, TX 75201

RE: MUR 4284
H. Ross Perot
United We Stand America, Inc.
Citizens to Establish a Reform Party and its treasurer

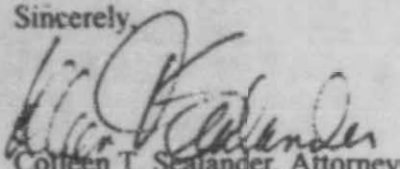
Dear Ms. Askew:

On November 30, 1995, your clients, H. Ross Perot, United We Stand America, Inc., and Citizens to Establish a Reform Party, were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,


Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793786



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Russell Verney, National Executive Director
United We Stand America, Inc.
7616 LBJ Freeway, Suite 727
Dallas, TX 75251

MUR: 4284

Dear Mr. Verney:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793787



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1996

Don Mott, Executive Director
United We Stand America-VA
911 Elden Street
Herndon, VA 22070

MUR: 4284

Dear Mr. Mott:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793788



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Rosemarie Sax, Executive Director
United We Stand America-CO
1805 South Belair
Denver, CO 80222

MUR: 4284

Dear Ms. Sax:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Sealander", written over a horizontal line.

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793789



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Claire Geddes, Executive Director
United We Stand America-UT
2477 E. Fort Union Blvd.
Salt Lake City, UT 84121

MUR: 4284

Dear Ms. Geddes:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

9704379379C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

David Shaver, Executive Director
United We Stand America-PA
355 N. 21st Street
Camphill, PA 17011

MUR: 4284

Dear Mr. Shaver:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Sealander", written over a circular stamp.

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793791



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Sandy Reckseit, Executive Director
United We Stand America-OH
2694 McVey Blvd. West
Columbus, OH 43235

MUR: 4284

Dear Ms. Reckseit:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793792



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

David Reckseit
2694 McVey Blvd., West
Columbus, OH 43235

MUR: 4284

Dear Mr. Reckseit:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

970437933



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1996

Rosalyn (Lynn) Williams
255 Corona Avenue
Dayton, OH 45419

MUR: 4284

Dear Ms. Williams:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793794



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1996

Debi Berberich, Executive Director
United We Stand America-WI
5282 Williamsburg Way
Madison, WI 53719

MUR: 4284

Dear Ms. Berberich:

On November 30, 1995, you were notified that the Federal Election Commission received a complaint from Deborah Taylor, M. Anne Saucier, and Clifford O. Arnebeck alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

The Commission received additional information from the complainants pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

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

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure

97043793795

BEFORE THE FEDERAL ELECTION COMMISSION

MAR 5 11 40 AM '97

In the Matter of

)
)
)
)

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 (DSCC); 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.

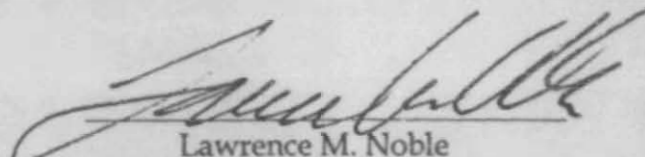
A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

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

97043793799

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)

97043793800

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

97043793801



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Deborah Taylor
5500 Market Street, #92
Youngstown, OH 44512

RE: MUR 4284

Dear Ms. Taylor:

On November 22, 1995, the Federal Election Commission received your complaint 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

97043793802



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 1 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Clifford Arnebeck
ARNEBECK & CHRISTENSEN
65 E. State Street, Suite 1000
Columbus, OH 43215

RE: MUR 4284

Dear Mr. Arnebeck:

On November 22, 1995, the Federal Election Commission received your complaint 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

97043793803



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anna M. Saucier
14901 Turney Road, Apt. 207
Maple Heights, OH 44137

RE: MUR 4284

Dear Ms. Saucier:

On November 22, 1995, the Federal Election Commission received your complaint 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

97043793804



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Norris Clark, Executive Director
United We Stand America-NJ
100 Metroplex, #202
Edison, NJ 08817

RE: MUR 4284

Dear Mr. Clark:

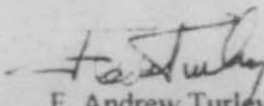
On November 30, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. 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

97043793805



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Wade Habshey, Executive Director
United We Stand America-IN
11216 Harrington Lane
Fishers, IN 46038

RE: MUR 4284

Dear Mr. Habshey:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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 Tynley
Supervisory Attorney
Central Enforcement Docket

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97043793806



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Richard Taylor, Executive Director
United We Stand America-GA
1380 W. Paces Ferry Road, N.W.
Atlanta, GA 30327

RE: MUR 4284

Dear Mr. Taylor:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

97043793807



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Ralph Perkins
North Central Regional Director-UWSA
70416 Wolcott
Armada, MI 48005

RE: MUR 4284

Dear Mr. Perkins:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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97043793808



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 1 1997

Robert and Mildred Fischer
2410 SR 222 South
New Richmond, OH 45157

RE: MUR 4284

Dear Mr. and Mrs. Fischer:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

97043793809



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Michael Farris, Chariman
Reform Party of California
11677 National Blvd., Suite 1996
Los Angeles, CA 90064

RE: MUR 4284

Dear Mr. Farris:

On July 16, 1996, the Federal Election Commission notified you of an amendment to a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the amendment and original complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against the Reform Party of California. 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

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9704379381C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Kim Askew, Esquire
HUGHES & LUCE, L.L.P.
1717 Main Street, Suite 2800
Dallas, TX 75201

RE: MUR 4284
H. Ross Perot, United we Stand America, Inc., its treasurer, Citizens to Establish a Reform Party, and its treasurer

Dear Ms. Askew:

On November 30, 1995, the Federal Election Commission notified your clients 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

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97043793811



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Chairman
United We Stand America-CA
11677 National Blvd., Suite 1996
Los Angeles, CA 90064

RE: MUR 4284

Dear Sir or Madam:

On July 16, 1996, the Federal Election Commission notified you of an amendment to a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the amendment and original complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against United We Stand America-CA. 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

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97043793812



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Russell Verney, National Executive Director
United We Stand America, Inc.
7616 LBJ Freeway, Suite 727
Dallas, TX 75251

RE: MUR 4284

Dear Mr. Verney:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

97043793813



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Don Mott, Executive Director
United We Stand America-VA
911 Elden Street
Herdon, VA 22070

RE: MUR 4284

Dear Mr. Mott:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

97043793814



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Rosemarie Sax, Executive Director
United We Stand America-CO
1805 South Belair
Denver, CO 80222

RE: MUR 4284

Dear Ms. Sax:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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97043793815



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APR 01 1997

Claire Geddes, Executive Director
United We Stand America-UT
2477 E. Fort Union Blvd
Salt Lake City, UT 84121

RE: MUR 4284

Dear Ms. Geddes:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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97043793816



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

David Shaver, Executive Director
United We Stand America-PA
355 N. 21st Street
Camphill, PA 17011

RE: MUR 4284

Dear Mr. Shaver:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

97043793817



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Sandy Reckseit, Executive Director
United We Stand America-OH
2694 McVey Blvd., West
Columbus, OH 43235

RE: MUR 4284

Dear Ms. Reckseit:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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97043793818



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

APR 01 1997

David Reckseit
2694 McVey Blvd., West
Columbus, OH 43235

RE: MUR 4284

Dear Mr. Reckseit:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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97043793819



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Rosalyn (Lynn) Williams
255 Corona Avenue
Dayton, OH 45419

RE: MUR 4284

Dear Ms. Williams:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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

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9704379382C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

Debi Berberich, Executive Director
United We Stand America-WI
5282 Williamsburg Way
Madison, WI 53719

RE: MUR 4284

Dear Ms. Berberich:

On November 30, 1995, the Federal Election Commission notified you 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 you. 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.

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

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043793821



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4284

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN JMU

97043793822



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 4/28/97

✓ Microfilm

 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4284

97043801059

ARNEBECK & CHRISTENSEN
65 E. STATE ST., SUITE 1000
COLUMBUS, OHIO 43215
614-480-3524
FAX: 614-481-7511

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COMMISSION
OFFICE OF GENERAL
COUNSEL

APR 9 2 36 PM '97

April 7, 1997

CLOSED

F. Andrew Turley
Supervising Attorney
Federal Election Commission
Washington, D.C. 20463

RE: MUR 4284

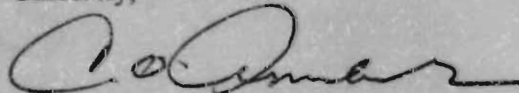
Dear Mr. Turley:

The above referenced complaint was filed on behalf of United We Stand America-Ohio, Inc. of which Deborah Taylor is Chairman, Anne Saucier is Secretary and I was acting as counsel for that matter.

Since the FEC complaint was filed litigation was filed in Ohio by the Perot forces seeking to engage the signers of the complaint in litigation as individuals, which was thrown out of court.

Please advise if you need additional information, and please call me as soon as possible if this has erroneously been recorded as a complaint of individuals, including myself.

Sincerely,



Clifford O. Arnebeck, Jr.

cc: Debora Taylor, Chairperson, United We Stand America-Ohio, Inc.
Anne Saucier, Secretary, United We Stand America-Ohio, Inc

9704380106C