



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4469

DATE FILMED 6-19-57 CAMERA NO. 1

CAMERAMAN Jm H

97043820978

SEP 18 9 54 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MUR4469

September 13, 1996

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

Dear General Counsel:

I am writing to inform you that the Carol Moseley-Braun for U.S. Senate Committee did not itemized a debt owed to me on its 1/01/96 - 6/30/96 report. The Committee has, in fact, an outstanding debt to me at the close of this period for \$6,803.40.

The report itemized a outstanding balance to me at the beginning of this period for \$13,000. This amount was incorrect. The correct outstanding balance for the beginning of the period should have been \$13,921.58

Also, the amount of debt incurred for the period is incorrect. I billed the Braun Committee \$12,000 for fundraising fees and \$744.66 for expenses in 1996. Therefore, the amount incurred during this period should have been \$12,744.66, not \$6,862.84. It is correct that I received payment of \$19,862.84, but the payment did not eliminated my debt. The total amount owed to me was \$26,666.24 (\$13,921.58 + \$12,000 + \$744.66). It was reduced by \$19,862.84 which leaves a balance at the close of the period of \$6,803.40. It seems the Braun Committee ignored reporting an additional \$12,744.66 in invoices from me during that period.

To support my complaint I am attaching the invoices I submitted to the Carol Moseley Braun for U.S. Senate Committee during reporting period 7/01/95 - 12/30/95 to support my assertion that the correct outstanding balance for the end of the period should have been \$13,921.58. Secondly, the invoices I am attaching for reporting period 1/01/96-6/30/96 will support my claim that the balance at the close of the period should have been \$6,803.40. In addition, I am enclosing a letter from Senator Moseley-Braun's chief of staff, Edith R. Wilson acknowledging the billing and payment of \$12,000 in fundraising fees in 1996.

End of Year 1995

July 4, 1995..... \$6,000.00
July 5, 1995.....\$188.50
July 17, 1995.....\$206.81
August 8, 1995....\$4,000.00
Sept. 4, 1995.....\$4,000.00
Sept. 5, 1995.....\$28,759.40
Sept. 25, 1995.....\$312.75

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

97043820979

Sept. 25, 1995.....\$312.75
Oct. 27, 1995.....\$4,000.00
Oct. 27, 1995.....\$115.84
Nov. 4, 1995.....\$4,000.00
Dec. 8, 1995.....\$4,000.00
Dec. 8, 1995.....\$46.34
\$55,629.64

\$55,629.64 invoices submitted
- 41,708.06 paid by Braun Committee
\$13,921.58 outstanding balance

Mid Year Report of 1996

January 1, 1996.....\$6,000.00
February 1, 1996.....\$6,000.00
February 14, 1996..\$744.66
\$12,744.66 invoices submitted
+ 13,921.58 debt obligation from 1995 end of year
\$26,666.24
- 19,862.84 paid by Braun Committee
\$6,803.40 amount due

During the months of both reporting periods, the committee and I attempted to negotiate a settlement on my September 5, 1995 invoice for \$28,759. I was very much aware that the Committee could not settle the debt for less than the full amount without my consent and without submitting a debt settlement plan to the FEC for approval. I was never asked to cooperate in devising a settlement plan for the FEC. Instead, I find that the Committee reduced it on its own by \$6,803.40 without my consent or the FEC approval.

Please contact me if I can supply you with any further information in order to file this complaint that the Carol Moseley-Braun for U.S. Senate Committee did not report an outstanding debt to me at the end of the 1/01/96 - 6/30/96 report.

Sincerely,

Jane Scott Brown

Jane Scott Brown
4306 Westover Place, NW
Washington, DC 20016

Subscribed and sworn to before me
this 16th day of Sept., 1996

Marion Spencer
Notary Public

My Commission Expires Sept. 30, 2000

97043820980

SCHEDULE D
Revised 3/80

DEBTS AND OBLIGATIONS
Excluding Loans

PERIOD COVERED 1/01/91 - 6/30/91

LINE NUMBER 10
(Use numbers 1 through 10 for each obligation listed)

Name or Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
Carol Mosley-Brown for U.S. Senate, CD0746610 A Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Earl Hopf, Treasurer 29 N. W. Chicago, IL 60606	128,507.46	7,000.00	24,500.00	111,007.46
Committee For Exp. Periods				
HQ Printers 200 North LaSalle Street Chicago, IL 60601	218.62			218.62
Copying Services				
Jane Scott Brown 4306 Westover Place, NW Washington, DC 20016	13,000.00	6,862.84	19,862.84	0.00
Printing Fee and Expenses				
Oldaker, Ryan, Leonard and Utrecht 818 Connecticut, NW Washington, DC 20006	50,999.81			50,999.81
Professional Services (Legal)				
Pitney Bowes 225 West Washington Chicago, IL 60606	2,129.30			2,129.30
Equipment Leasing and Cancellation Adjustment				
Stephanie Holtz 7137 S. Darlington Tulsa, OK 74136	577.88			577.88
Reimbursement of Moving Expenses				
1) SUBTOTALS This Period This Page (optional)				
2) TOTALS This Period (last page in this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) AGO 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

7ESAN111

JANE SCOTT BROWN ASSOCIATES

January 1, 1996

Braun for U. S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

January Fundraising Fee for Clinton Event
to be held on January 29, 1996.....\$6,000.00

97043820982

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

JANE SCOTT BROWN ASSOCIATES

February 1, 1996

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

February fundraising fee for Clinton Event
on January 29, 1996.....\$6,000.00

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820983

**CAROL
MOSELEY
BRAUN**
DEMOCRAT U.S. SENATE



January 22, 1996

Jane Scott Brown
Jane Scott Brown & Associates
4306 Westover Place NW
Washington, D.C. 20016

Dear Jane,

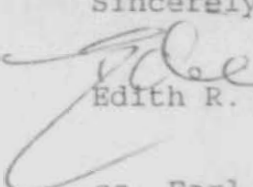
This is to inform you that the Braun for U.S. Senate Campaign has agreed to pay you \$6,000 in January and \$6,000 in February for your current work. This is largely but not limited to the fund-raising for the Clinton event on January 29th.

In addition, we have agreed to pay \$2,000 to Kimi Washington to provide assistance to you for this event, and will pay this directly in two payments. This will save you from having to hire an assistant.

A check for \$6,000 is being sent to you today by express mail and should arrive tomorrow. A second check for \$6,000 will be sent by express mail on February 1st. This will cover the work described in your memo to me of January 19th, and should include thank you letters to the steering committee as well as all contributors.

Please let me know if you have questions.

Sincerely,


Edith R. Wilson

cc: Earl Hopewell
Edward Coaxum, Jr.

JANE SCOTT BROWN ASSOCIATES

February 14, 1996

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Reimbursement for out-of-pocket expenses:

Courier.....	\$139.90
Long Distance.....	175.45
FedEX.....	91.25
(3@ \$13, one @ \$27.25 one @ \$25)	
Name Tags.....	34.99
Taxi.....	55.00
Manila Envelopes.....	19.25
(77@ \$.25)	
Lazer Ink.....	75.12
Xerox Paper.....	16.47
Envelopes for Compliance Letters...	25.03
Taxi for Kimi from Hill.....	6.60
Stamps.....	<u>105.60</u>

Total: \$744.66

202/364-6654
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WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LTD. D.

97043820985

Form 2800
(Revised 1/83)

UNITED STATES SENATE
(POST-ELECTION DEBT)

Page 1 of 2 for
LINDA M. MATHIS

Name of Committee (in Full)	Outstanding Debt as Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Debt as End of This Period
Carol Mosley-Brown for U.S. Senate 20000000				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Jane Scott Brown				
4306 Westover Place, N.W. Washington, DC 20016	-0-	54,708.06		13,000.00
Nature of Debt (Purpose):				41,708.06
Fundraising Fee and Expenses				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Blank				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Didar, Ryan S Leonard				
818 Columbia St. N.E. Washington, DC 20004	55,999.81		5,000	50,999.81
Nature of Debt (Purpose):				
Professional Services (Legal)				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Pitney Bowles				
225 West Washington Chicago, IL 60606	2,129.30			2,129.30
Nature of Debt (Purpose):				
Equipment Leasing and cancellation adjustments				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Blank				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Stephanie Wells				
7137 S. Burlington Tulsa, OK 74136	577.00			577.00
Nature of Debt (Purpose):				
Reimbursement of Moving Expenses				
1) TOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				66,706.99
3) TOTAL OUTSTANDING DEBT from Schedule C (last page only)				
4) Add 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

July 17, 1995

Braun for US Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Reimbursement for expenses:

Long Distance.....	\$120.71
Entertainment.....	25.10
Federal Express.....	<u>61.00</u>

Total Due \$206.81

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WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820987

JANE SCOTT BROWN ASSOCIATES

July 5, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Reimbursement of expenses:

Long Distance.....	100.86
Federal Express.....	70.00
Stamps.....	12.80
Binder & Tabs.....	4.84
Courier.....	<u>19.30</u>

Amount Due: \$188.50

202/364-6654
4306 WESTOVER PLACE, N.W.
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A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820988



July 4, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

June Base.....\$6,000.00

Base to be drawn against commission due on attached commission report.

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL, LIMITED

97043820989

JANE SCOTT BROWN ASSOCIATES

August 8, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

July Retainer.....\$4,000.00

9704382099C

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

JANE SCOTT BROWN ASSOCIATES

September 4, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

August Retainer.....\$4,000.00

97043820991

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

September 5, 1995

Braun for U. S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Final Commission Due under 1994/95 contract.....\$28,759.40

Please refer to attached memorandum for a breakdown of the invoice. Copies of the two commission reports from which the commissions were calculated are also included.

The June 20, 1994 report is a total of all the funds I raised for the June 20th event in Chicago. All the commission due from this report has been paid.

The August 3, 1995 report is total of all the funds (excluding the June 20th event) I raised for the duration of my contract from March 21, 1994 to June 30, 1995 in which my compensation was based on commission.

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

97043820992

JANE SCOTT BROWN ASSOCIATES

September 25, 1995

Paid

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----Invoice-----

Reimbursement for the following expenses:

Long Distance.....	\$163.25
Federal Express.....	92.50
UPS.....	19.20
Courier.....	<u>37.80</u>
	\$312.75

Reimburse expenses to be deducted from \$600 advance.

\$600.00	8/9 rec'd
-188.50	7/5 invoice rec'd
-206.81	7/17 invoice rec'd
- <u>312.75</u>	9/25 invoice
\$108.06	Amount Due

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820993

October 27, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Reimbursement for expenses

Long Distance.....	\$17.44
Stamps.....	38.40
Federal Express.....	<u>.60.00</u>

Total: \$115.84

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

97043820994

October 27, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

October Retainer.....\$4,000.00

97043820995

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016



JANE SCOTT BROWN ASSOCIATES

November 4, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

November Retainer.....\$4,000.00

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820996

JANE SCOTT BROWN ASSOCIATES

December 8, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

December Retainer.....\$4,000

97043820997

202/264-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL, LIMITED

December 8, 1995

Braun for U.S. Senate
201 No. Wells Street
Chicago, IL 60606

-----INVOICE-----

Long Distance.....	\$26.34
Federal Express.....	20.00

Amount Due:	<u>\$46.34</u>
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202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043820998



FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 25, 1996

Jane Scott Brown
4306 Westover Place, NW
Washington, DC 20016

RE: MUR 4469

Dear Ms. Brown:

This letter acknowledges receipt on September 18, 1996, of the complaint you filed 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 4469. 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,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure
Procedures

97043820999



FEDERAL ELECTION COMMISSION

Washington, DC 20463

September 25, 1996

Billie Paige, Treasurer
Carol Moseley-Braun for US Senate
819 E. Wabash Avenue
Suite 505
Chicago, IL 60605

RE: MUR 4469

Dear Ms. Paige:

The Federal Election Commission received a complaint which indicates that Carol Moseley-Braun for US Senate ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4469. Please refer to this number in all future correspondence.

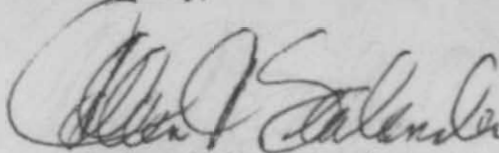
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements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

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

9704382100C

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

cc: Carol Moseley-Braun

97043821001

WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE

CHICAGO, ILLINOIS 60606-1229

(312) 201-2000

FAX: (312) 201-2555

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 22 3 08 PM '96

LOUIS P. VITULLO
(312) 201-2590

October 14, 1996

Colleen T. Sealander
Attorney
Central Enforcement Docket
Federal Election Commission
Washington, DC 20463

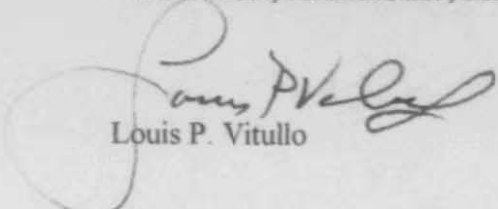
Re: MUR4469

Dear Ms. Sealander:

Please be advised that we have been directed by Billie Paige, Treasurer of the Carol Moseley-Braun for U.S. Senate Committee to appear on the captioned MUR. Accordingly, we would appreciate confirmation that this letter constitutes our appearance and that we be permitted to file our response by October 31, 1996.

Very truly yours,

WILDMAN, HARROLD, ALLEN & DIXON


Louis P. Vitullo

LPV:mjc

97043821002

WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE
CHICAGO, ILLINOIS 60606-1229
(312) 201-2000
FAX: (312) 201-2555

LOUIS P. VITULLO
(312) 201-2590

December 4, 1996

VIA FACSIMILE

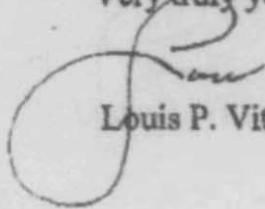
Mr. Erik Morrison
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4469

Dear Erik:

I enclose our Designation of Counsel. Consistent with our conversation, please forward your initial notification and my correspondence regarding an extension of time to answer this complaint. I will endeavor to have an Answer on file by December 6, 1996.

Very truly yours,


Louis P. Vitullo

LPV:skn
Enclosure

Doc: 7777

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COMMISSION
OFFICE OF GENERAL
COUNSEL
Dec 4 5 01 PM '96

97043821003

STATEMENT OF DESIGNATION OF COUNSEL

NO. 4469

NAME OF COUNSEL: Louis P. Vitullo

ADDRESS: Wildman, Harrold, Allen & Dixon

225 West Wacker

Chicago, IL 60606

TELEPHONE: 312.201.2590

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.

12-3-96
Date

Billie J. Paige
Signature

RESPONDENT'S NAME: Ms. Billie Paige, Treasurer, Braun for Senate Campaign

ADDRESS: Shea Royal & Associates, Ltd.

2205 Enterprise Drive

Westchester, IL 60154

HOME PHONE:

BUSINESS PHONE: 708.531.0880

97043821004

WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE

CHICAGO, ILLINOIS 60606-1229

(312) 201-2000

FAX: (312) 201-2555

LOUIS P. VITULLO

(312) 201-2590

December 17, 1996

Via Telecopier (202/219-3923)

Mr. Erik Morrison
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 17 5 33 PM '96

Re: Complaint of Jane Scott Brown Against Carol Moseley-Braun for U.S. Senate
Committee
MUR 4469

Dear Mr. Morrison:

This letter serves as the formal response of the Carol Moseley-Braun for U.S. Senate Committee (the "Committee") and its Treasurer, Billie J. Paige, to the complaint of Jane Scott Brown ("Ms. Brown"). This complaint was filed with the Federal Election Commission (the "FEC") and docketed as MUR 4469.

As you discussed with myself and my partner, Mark J. McCombs, this response was delayed due to problems in the transmission of the designation of counsel form from the Committee to our firm, illness and personal commitments by myself and others responsible for assisting me in this matter. I apologize for the delay and ask that the response be filed.

This response is supported by the attached and incorporated affidavit of the Committee's Treasurer, Billie J. Paige, attesting to the truth and accuracy of the matters stated in this response.

Ms. Brown's complaint is without merit. Therefore, the FEC should take no action against the Committee or its Treasurer. Unfortunately, Ms. Brown has not provided the FEC with correspondence relevant to this matter. The Committee retained Ms. Brown as a fundraiser. The Committee entered into a settlement of all sums due Ms. Brown. The settlement was required because Ms. Brown could not present evidence that she had raised certain funds for the Committee, despite the fact that she sought compensation for those contributions. This settlement is reflected in my February 21, 1996 letter to Ms. Brown, Ms. Brown's February 21, 1996

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WILDMAN, HARROLD, ALLEN & DIXON

Mr. Erik Morrison
December 17, 1996
Page 2

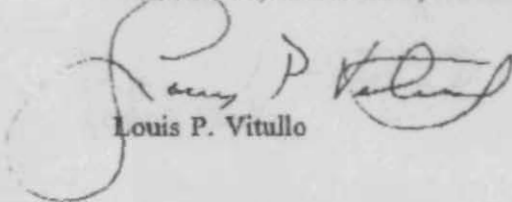
memorandum to me (in which Ms. Brown asks for a final payment of \$ 21,958 -- not \$ 28,759, as set forth in her complaint) and my February 23, 1996 letter to Ms. Brown. True and correct copies of these letters are attached to and incorporated within this response. All payments pursuant to this settlement have been made.

The Committee is reviewing its records and, to the extent necessary, will amend any reports which do not accurately reflect this settlement and these payments.

Please do not hesitate to contact me if I can provide you with additional information regarding this matter.

Very truly yours,

WILDMAN, HARROLD, ALLEN & DIXON


Louis P. Vitullo

LPV/MJM/mm

97043821006

WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE

CHICAGO, ILLINOIS 60606-1229

(312) 201-2000

FAX: (312) 201-2555

LOUIS P. VITULLO

(312) 201-2590

February 21, 1996

VIA FACSIMILE

Ms. Jane Scott Brown
Jane Scott Brown Associates
4306 Westover Place, N.W.
Washington, D.C. 20016

Dear Jane:

Under separate cover, a check for \$15,000 is being sent to you today. \$6,500 will be mailed to you upon completion of your work on the President Clinton event including collection of \$60,000 in outstanding pledges, preparation of thank you letters to hosts and the host committee of contributors, and a full written report on the event as well as completion of the February 28, 1996 Securities Industry Association Fund-raiser in Washington, and the collection of all checks for that event. If less than \$5,000 remains outstanding for either event, you will provide the names and telephone numbers of the pledges, and recap in writing your efforts to collect for the benefit of the Committee. The \$6,500 will constitute a final payment of full and complete payments for any and all sums due and owing to you for your contractual services from April, 1994 to and through July, 1995. These checks will be sent to you subject to the following terms and conditions:

1. By negotiating these checks, you acknowledge that all payments due and owing to you have been made and paid in accordance with the terms of the contract.
2. All letterhead, books, records, files and computerized donor records in list or disk format will be turned over to the Braun for Senate Campaign no later than March 15, 1996, and before the final check is issued.
3. You agree that you will observe complete confidentiality regarding the services that you performed for the Senator and any and all aspects of those services and any and all aspects of your fund-raising activity. You further agree that no interviews will be granted and any and all aspects of your engagements are and will remain completely confidential. I will prepare a written undertaking for you in this regard.

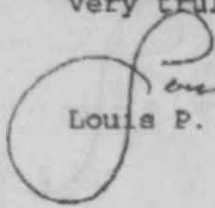
97043821007

WILDMAN, HARROLD, ALLEN & DIXON

Page 2

I am pleased that we have been able to finally resolve this matter and on behalf of the Braun for Senate Committee thank you for your efforts.

Very truly yours,


Louis P. Vitullo

LPV:skn

cc: Mr. Earl Hopewell

97043821008

JANE SCOTT BROWN ASSOCIATES

Memorandum

DATE: February 21, 1996
TO: Lou Vitullo
FROM: Jane Scott Brown
CC: Edie Wilson and Earl Hopewell

I am sorry Lou, but your conditions for a final settlement of compensation owed is not acceptable to me. I want the final payment of \$21,958 plus a check for October, December and February expenses of \$906.84 by Friday or I will return all the checks and compliance forms in my possession to the contributors and commence legal action against the committee. I will not be put in a position ever again of expecting payment from the Braun for U.S. Senate "sometime in the future."

You will have to trust me that I will complete my duties for the Clinton and Securities events. I know where the outstanding checks are and will collect them to the best of my ability. I am a professional and always complete what I say I will do. You should know that by now and you can be assured I will complete all the duties outlined in your letter.

I think it is in your interest that I continue the check collection as well as send Earl all the checks I have. Therefore, I look forward to receiving checks for \$15,000, \$6,958 and \$906.84 by Friday, February 23, 1996.

202/364-6654
4306 WESTOVER PLACE, N.W.
WASHINGTON, D.C. 20016

A DIVISION OF GEORGETOWN INTERNATIONAL LIMITED

97043821009

Dec. 17, 1996

4:05PM

WILDMAN, HARROLD, ALLEN & DIXON

No. 0831 P. 7/7

WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE

CHICAGO, ILLINOIS 60606-1229

(312) 201-2000

FAX: (312) 201-2555

LOUIS P. VITULLO

(312) 201-2590

February 23, 1996

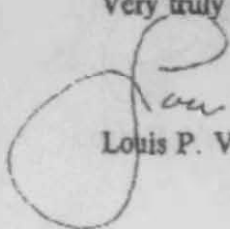
Via Fax/202-364-5723

Ms. Jane Scott Brown
Jane Scott Brown Associates
4306 Westover Place, N.W.
Washington, D.C. 20016

Dear Jane:

Thanks for your response of February 21, 1996. We agree with all of your monetary conditions, including final payment of \$6,958 and \$960.84 in expenses and are prepared to deliver the check to an agreed upon third party to be held in escrow until all of the conditions set out in my correspondence of February 21, 1996 have been completed. I am informed that \$15,000 has already been send to you. Please confirm.

Very truly yours,


Louis P. Vitullo

LPV:kd

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WILDMAN, HARROLD, ALLEN & DIXON

225 WEST WACKER DRIVE

CHICAGO, ILLINOIS 60606-1229

(312) 201-2000

FAX: (312) 201-2555

January 20, 1997

MARK J. MCCOMBS
(312) 201-2501

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JAN 21 10 38 AM '97

VIA FACSIMILE and FEDERAL EXPRESS

Erik Morrison
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Complaint of Jane Scott Brown against Carol Moseley-Braun for
U.S. Senate Committee
MUR4469

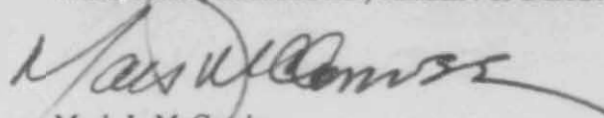
Dear Mr. Morrison:

Enclosed, please find the Affidavit of Carol Moseley-Braun for U.S. Senate Committee Treasurer, Billie J. Paige, in support of the Committee's response to the above-referenced MUR. The original Affidavit is being forwarded to you via overnight delivery. The Affidavit was inadvertently omitted from the Committee's filing of this response

Please contact me if you have any questions about this matter.

Very truly yours,

WILDMAN, HARROLD, ALLEN & DIXON


Mark J. McCombs

MJM:mjc
Enclosure

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County of Cook)
)
 State of Illinois) SS.

AFFIDAVIT

I, Billie J. Paige, being first duly sworn upon oath, depose and state that if called, I would competently testify as follows:

1. I am the Treasurer of the Carol Moseley-Braun for U.S. Senate Committee (the "Committee"). I have personal knowledge of the matters stated in this affidavit and am authorized to make it.

2. This affidavit is intended to support the December 17, 1996 response to the Federal Election Commission complaint docketed as MUR 4469. That December 17, 1996 response was made on the Committee's behalf by its counsel, Louis P. Vitullo.

3. The Committee retained Ms. Jane Scott Brown as a fundraiser. The Committee entered into a settlement of all sums due Ms. Brown. The settlement was required because Ms. Brown could not present evidence that she had raised certain funds for the Committee, despite the fact that she sought compensation for those contributions. This settlement is reflected in Mr. Vitullo's February 21, 1996 letter to Ms. Brown, Ms. Brown's February 21, 1996 memorandum to Mr. Vitullo and Mr. Vitullo's February 23, 1996 letter to Ms. Brown. Copies of these letters are attached to the December 17, 1996 response described in paragraph 2, above.

Further affiant sayeth not.

Billie J. Paige
 Billie J. Paige

Subscribed and sworn to before me
 this 17 day of December, 1996.

Kathleen Lightfoot
 Notary Public

~~~~~  
 "OFFICIAL SEAL"  
 Kathleen Lightfoot  
 Notary Public, State of Illinois  
 My Commission Exp. 09/25/2000  
 ~~~~~

97043821012

BEFORE THE FEDERAL ELECTION COMMISSION

MAY 6 2 45 PM '97

In the Matter of

)
)
)
)

ENFORCEMENT PRIORITY

GENERAL COUNSEL'S REPORT

SENSITIVE

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 28 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.

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¹ These cases are: MUR 4419 (*Weinzapfel for Congress*); MUR 4423 (*Davis for Congress*); MUR 4424 (*Nevadans for "Spike" Wilson*); MUR 4429 (*Delahunt for Congress*); MUR 4430 (*Jean Leising for Congress*); MUR 4431 (*Engel for Congress*); MUR 4433 (*Delahunt for Congress*); MUR 4437 (*DiNicola for Congress Committee*); MUR 4440 (*Sue Kelly for Congress*); MUR 4450 (*National Treasury Employees*); MUR 4452 (*Mid-Suffolk N.O.W.*); MUR 4455 (*City of Milwaukee*); MUR 4456 (*Jackson Mint Ltd.*); MUR 4457 (*U.S. Department of Health and Human Services*); MUR 4458 (*KMA-AM Radio*); MUR 4461 (*Americans For Freedom Of Choice PAC*); MUR 4462 (*Ellen O. Tauscher*); MUR 4464 (*Norwood for Congress*); MUR 4465 (*Lincoln for Congress*); MUR 4469 (*Moseley-Braun for Senate*); MUR 4475 (*Manpower Temporary Services, Inc.*); MUR 4479 (*Owens for Congress Committee*); MUR 4482 (*Mike McCormack for Congress*); MUR 4487 (*Citizens for A Strong America*); MUR 4488 (*Ortiz for Congress*); MUR 4489 (*Gill for Congress*); MUR Pre-MUR 338 (*Richard Chrysler Inc.*); and Pre-MUR 339 (*Mammel & Associates, Inc.*).

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective May 19, 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.

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III. RECOMMENDATIONS.

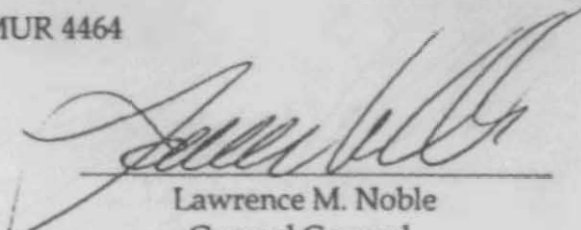
A. Decline to open a MUR, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 338
2. Pre-MUR 339

B. Take no action, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

- | | | |
|-------------|--------------|--------------|
| 1. MUR 4419 | 10. MUR 4450 | 19. MUR 4465 |
| 2. MUR 4423 | 11. MUR 4452 | 20. MUR 4469 |
| 3. MUR 4424 | 12. MUR 4455 | 21. MUR 4475 |
| 4. MUR 4429 | 13. MUR 4456 | 22. MUR 4479 |
| 5. MUR 4430 | 14. MUR 4457 | 23. MUR 4482 |
| 6. MUR 4431 | 15. MUR 4458 | 24. MUR 4487 |
| 7. MUR 4433 | 16. MUR 4461 | 25. MUR 4488 |
| 8. MUR 4437 | 17. MUR 4462 | 26. MUR 4489 |
| 9. MUR 4440 | 18. MUR 4464 | |

5/6/97
Date


Lawrence M. Noble
General Counsel

97043821016

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Enforcement Priority.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that the Commission decided by a vote of 5-0 on May 12, 1997, to take the following actions with respect to the General Counsel's May 6, 1997 report on enforcement priority:

- A. Decline to open a MUR, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 338
2. Pre-MUR 339

- B. Take no action, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

- | | | |
|-------------|--------------|--------------|
| 1. MUR 4419 | 10. MUR 4450 | 19. MUR 4465 |
| 2. MUR 4423 | 11. MUR 4452 | 20. MUR 4469 |
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| 7. MUR 4433 | 16. MUR 4461 | 25. MUR 4488 |
| 8. MUR 4437 | 17. MUR 4462 | 26. MUR 4489 |
| 9. MUR 4440 | 18. MUR 4464 | |

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

Attest:

5-13-97
Date

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

Received in the Secretariat: Tues., May 06, 1997 2:45 p.m.
Circulated to the Commission: Wed., May 07, 1997 11:00 a.m.
Deadline for vote: Mon., May 12, 1997 4:00 p.m.

bjr

97043821017



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jane Scott Brown
4306 Westover Place, NW
Washington, DC 20016

RE: MUR 4469

Dear Ms. Brown:

On September 18, 1996, 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 has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 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. § 437g(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043821018

MUR 4469

MOSELEY-BRAUN FOR SENATE

Jane Scott Brown alleges that the Carol Moseley-Braun for U.S. Senate Committee (the "Committee") failed to properly itemize the beginning and ending balances of a debt owed her for fundraising fees and expenses in the 1/01/96-6/30/96 report. Ms. Brown states that the net balance owed to her at the end of the reporting period was stated as \$6,803.40 but should have reflected a balance due of \$13,921.58.

According to the Committee and its treasurer, Billie J. Paige, Ms. Brown was a paid fund-raiser under contract to the campaign whose compensation was tied to the amount of funds raised and collected. Ms. Paige reports that a billing dispute arose between Ms. Brown and the Committee regarding whether fees were payable for certain contributions. The Committee attempted to resolve the matter by settlement. Ms. Paige further states that Ms. Brown and the Committee have already resolved this dispute, agreeing to place \$7,864.84 in escrow pending submission of further proof of entitlement to all or part of the money.

This matter is less significant relative to other matters pending before the Commission.

97043821019



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 19, 1997

Louis P. Vitullo, Esq.
Wildman, Harrold, Allen & Dixon
225 West Wacker Drive
Chicago, IL 60606-1229

RE: MUR 4469

Carol Moseley-Braun for U.S. Senate, Billie Paige, Treasurer

Dear Mr. Vitullo:

On September 25, 1996, 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 has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 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 Jennifer Henry at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

9704382102C

MUR 4469

MOSELEY-BRAUN FOR SENATE

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This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4469

DATE FILMED 6-19-97 CAMERA NO. 1

CAMERAMAN JM II

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