



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 4587

DATE FILMED 7/10/98 CAMERA NO. 1

CAMERAMAN EES

980438933634

Kristin R. Kazyak

128 W Main Street
Front Royal, VA 22630

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

NOV 12 1 10 PM '96

Long Distance: 800-575-7874
Home Office: 540-636-8639

November 11, 1996

Reporting Requirement Violation

TO: *Larry Noble* FEC General Counsel's Office, 999 E Street, NW, DC 20463

COMMENTS: Attached please find:

1. Complaint (3 copies signed and notarized) to the FEC General Counsel, Larry Noble, regarding violations of the Reporting Requirement (statute 434 and CFR §104 as well as statute 437GA1 and CFR §111.4) by the Alan Keyes for President Committee, Inc. This Complaint includes copies of the materials that I prepared and sent to the bankruptcy trustee as well as a cover letter focusing facts of the case regarding the unpaid, unreported invoicing.
2. In both March and May 1996, the Campaign Manager, Dave Racer, authorized signature and filing of the monthly FEC report *only* after the altering, removal or whiting out (see filed FEC 1996 Reports: March D-P p.5; May 1996 D-P p.7 of 14) of invoicing for the professional fees of Kristin R. Kazyak, employed by the Committee and a member of the senior staff from August 1, 1995 thru July 31, 1996.
3. The repeated removal of **ONLY** this item of invoicing in the monthly FEC reports, contradicts the NOTE TO MARCH 1996 FEC REPORT filed with Schedule D-P:

...In order to finally identify any and all such contingent liabilities, extensive efforts were undertaken to contact and request data from vendors, service providers, and staff to quantify the claims. The results of this effort are reflected in this report, which compiles asserted indebtedness irrespective of documentation or the committee's belief as to whether there is any legitimate basis for the claim. Claims for compensation based on informal agreement make up a substantial portion of this new debt. This report is made in an effort to meet a strict standard for disclosure of even asserted and unsubstantiated obligations.

4. The Committee's failure to report or compensate these professional services and the invoiced fees led directly to my filing personal bankruptcy July 25, 1996 and constitute as well, an unpaid, unreported individual loan, or "contribution", to the Committee of over \$120,000, well in excess of the individual limit of \$1,000.

County of Warren, Commonwealth of Virginia

The foregoing instrument was acknowledged before me this 11th day of November, 1996.

Kristin R. Kazyak
Kristin R. Kazyak

Helen Babineau
Helen Babineau, Notary Public

My commission expires July 31, 2001

93043893635



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 18, 1996

Kristin R. Kazyak
128 W Main Street
Front Royal, Virginia 22630

Dear Ms. Kazyak:

23043893636
This is to acknowledge receipt on November 12, 1996, of your letter dated November 11, 1996. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

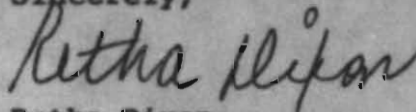
In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. Sc 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

If you have any questions concerning this matter, please
contact me at (202) 219-3410.

Sincerely,



Retha Dixon
Docket Chief

Enclosure

cc: Alan Keyes for President '96

98043893637

Kristin R. Kazyak

128 W Main Street
Front Royal, VA 22630

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Long Distance: 800-575-7874
Home Office: 540-636-8639

Nov 25 7 26 AM '96

November 22, 1996

Reporting Requirement Violation

mur 4587

TO: *Larry Noble*

FEC General Counsel's Office
999 E Street, NW, DC 20463

COMMENTS: Please find:

1. **Three** FEC compliant notary statements (to the letter of USC § 437g) to be attached to the original documentation submitted in triplicate November 12, 1996:

Complaint (3 copies signed and notarized) to the FEC General Counsel, Larry Noble, regarding violations of the *Reporting Requirement* (statute 434 and CFR §104 as well as statute 437GA1 and CFR §111.4) by the *Alan Keyes for President Committee, Inc.* This Complaint includes copies of the materials that I prepared and sent to the bankruptcy trustee as well as a cover letter focusing facts of the case regarding the *unpaid, unreported invoicing*.

2. The notary statement submitted on November 12, 1996 and used by notaries in the Commonwealth of Virginia also demands that the complaints or documents be *sworn to*, as they were, and *signed in the presence of a notary public and notarized* (see attached VA notary requirements).

County of Warren, Commonwealth of Virginia

The foregoing instrument was acknowledged before me, subscribed and sworn to before me on both the 11th and this 22nd day of November, 1996.

Kristin R. Kazyak

Kristin R. Kazyak

Helen Babineau

Helen Babineau, Notary Public

My commission expires July 31, 2000

98043893638

Kristin R. Kazyak

128 W Main Street
Front Royal, VA 22630

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 12 1 46 PM '96

Long Distance: 800-575-7874
Home Office: 540-636-8639

November 11, 1996

Reporting Requirement Violation

TO: *Larry Noble* FEC General Counsel's Office, 999 E Street, NW, DC 20463

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3. The repeated removal of **ONLY** this item of invoicing in the monthly FEC reports, contradicts the **NOTE TO MARCH 1996 FEC REPORT** filed with *Schedule D-P*:

...In order to finally identify any and all such contingent liabilities, extensive efforts were undertaken to contact and request data from vendors, service providers, and staff to quantify the claims. The results of this effort are reflected in this report, which compiles asserted indebtedness irrespective of documentation or the committee's belief as to whether there is any legitimate basis for the claim. Claims for compensation based on informal agreement make up a substantial portion of this new debt. This report is made in an effort to meet a strict standard for disclosure of even asserted and unsubstantiated obligations.

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County of Warren, Commonwealth of Virginia

The foregoing instrument was acknowledged before me this 11th day of November, 1996.

Kristin R. Kazyak
Kristin R. Kazyak

Helen Babineau
Helen Babineau, Notary Public

My commission expires July 31, 2001

98043893639

INDEX OF ATTACHMENTS

I	CFR § 118.6 Salary payments owed to employees	1
	Resume submitted to the Keyes campaign in April	2
	Invoices submitted to the Committee (Jan - July '96)	3
II	January FEC Report Summary pages (only immediate Committee indebtedness to staff was included in this report for the first time)	4
	March FEC Report Summary pages <i>NOTE TO THE MARCH 1996 FEC REPORT</i> Original page 5; and FEC submitted page 5	5
	May FEC Report Summary pages submitted page with deletion of debt/invoiced entry and p. 13 original page 7 and total page 13	6
	June & July FEC Report Summary pages total receipt of Federal Funds line 16	7

98043893640

Memo to Trustee
from Kristin R. Kazyak

Employment with the Keyes Campaign August 1, 1995 through July 31, 1996

1. For the past 15 years, I have worked as a private computer and media contractor (see resume ②). In the mid 80s my contractual fee listed at \$60/hr and increased to \$90/hr in 1994 with contract offers from IBM and the International Monetary Fund. At that time I was completing 2 years of research and development to form my own limited partnership and establish a \$2 million dollar multimedia development company projected to open its doors in Scranton PA in April 1995.
2. When Alan Keyes launched his presidential campaign in March 1995, Mary Parker Lewis asked me for my resume in the hope that she would be able to hire me to handle administrative and computer work for the Keyes campaign. Due to the untimely loss of my principal investor in February 1995, I restructured my board of advisors and postponed further development until we met. I emphasized to Mrs. Lewis in April and again in July that I was in no position to do any work, particularly campaign related, that was not contracted full-time and fully compensated. By mid-July, Aegis Corporation had called me for several interviews, and an offer to work with their digital graphics team was under consideration when Mary Parker Lewis informed me that the Committee was in a position to contract my services full-time. At that time, Campaign Manager Sydney Hoff Hay projected campaign contributions, estimated under half a million for the 3rd quarter, would increase to a *minimum* of 3 million by January, and both the Campaign Manager and Mrs. Lewis were confident that fundraising was sufficiently underway to facilitate current campaign debt reduction and the hire of professional staff.
3. At the end of July 1996, the Alan Keyes for President '96, Inc. (AKP) committee recorded receipts of \$3.8 million dollars and over \$611,000 in Federal Matching Funds. The *first* check I received for \$3,300, the *minimum* payment on my professional fees as contracted in July 1995, arrived at the end of June 1996 from the St. Paul office (see last column of July invoice ③ "Sal Paid"). Mary Lewis was limited by counsel to reimburse only the immediate campaign expenses of the Alexandria office from AKP's 1st Union account there.
4. During a mid-July conference-call with Southwest Policy Group, Mary Parker Lewis, Chief of Staff, announced my addition to the senior staff and discussed the details of my agreement and work as I joined the Alan Keyes campaign staff full time. Mrs. Lewis offered during that discussion to pay me the minimum due on my monthly fee each month until the Committee received sufficient campaign funds or contributions to pay professional fees in full. All senior staff on the Committee, whether formally or informally contracted as I was (see 11 CFR § 116.6 ④ attached) agreed to defer full payment of their professional fees and accept a minimum *monthly* payment until such time as campaign funding made full payment possible. My *minimum* monthly fee was set at \$5,000.00 per month *plus reimbursement of all expenses*. I began work as a member of the senior staff on the Alan Keyes for President '96, Inc. (AKP) campaign committee August 1, 1995.
5. On or near July 25, I called my creditors to notify them that I had accepted a new position with an initially underfunded grassroots presidential campaign. I requested and received reduced monthly payments (see table ⑤ and so lowered my *minimum* monthly professional fee to \$3,300 until such time as contributions and matching funds made payment in full possible as noted on the invoices.
6. No debt owed by the Committee to staff was reported before Jan 1996. In the January FEC report, my invoicing for the *minimum* due on my invoice was listed (see page 4 of "Debts and Obligations" ⑥) along with other Committee debt to staff listed for the first time.
7. Contrary to the NOTE (see ⑦) filed with the "New Debt" portion of the FEC report for March '96, Dave Racer refused to have Mary Lewis sign and submit the FEC report for March until the entry in "Debts and Obligations" for my full professional fees was removed. The addition of all other staff debt for full professional fees was made *including the addition of disputed invoices such as invoicing received by the Committee from contractors or vendors for work alleged but not authorized by the Committee*.

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8. For the May FEC report, after further discussion and review of the FEC requirements, I entered all previously unlisted invoicing for full disclosure of the Committee's debt to senior staff including my own. The CPA and I completed the FEC report on June 19 since we would both be out of town on the 20th. The report was faxed to Dave Racer and a copy for signature and submission to the FEC was left at Quinn, Lynch & Lobel for Mary Parker Lewis' signature and her delivery of the report to the FEC on June 20. I did not receive my copy of the filed report until June 26, on my return from upgrading software and hardware for staff at our Emmitsburg office, at which time I discovered that Dave Racer had again insisted on the removal of only one line in the report, the inclusion of my full professional fee. The deletion of the entry on p. 7, and the alteration of totals on p. 13 and the summary page are conspicuous in the submitted report (see ③).
9. My work for the campaign required that I remain in 24 residence at the Alexandria office and included a minimum of 19 hours/day, 7 days a week, as well as alternating 24 hour phone duty with the Chief of Staff. It also included the loan and use of all my own technical equipment and resources. I:
- computerized bookkeeping and preparation of the accounts payable and disbursements for the quarterly and monthly FEC reports
 - programmed and customized forms and databases for FEC reporting
 - automated the daily AKP bank deposit and streamlined the caging process; delivered the daily AKP deposit to 1st Union Bank in Alexandria
 - automated the filing and tracking of campaign files and bank deposit records
 - filmed all of Dr. Keyes' Washington DC appearances
 - recorded all of Alan Keyes' broadcast speeches and interviews; this included correcting and properly programming all unfunctional electronic equipment including digital answering machines, VCRs, and cable currently installed in the office as well as overseeing the installation of an additional cable resource
 - served as NewMedia Contact for all alternative media Internet supporters, email correspondence, video releases, including major media press releases, contacts, and scheduling via the Internet
 - handled data entry, conversion and Internet transfers of the in-house database between Alexandria and SW Policy Group in AZ
 - submitted a proposal for the immediate software integration of a customized, low cost, fully computerized and scanned, in-house, data entry process to accelerate Matching Funds submissions, as well as maximize and improve submission accuracy; recommended an automated Bar Code filing system for deposits and campaign records
 - transcribed and posted to Internet Alan Keyes' speeches (Dr. Keyes gives all his speeches extempore); in November, transmission of my transcripts via email to Grant's email address provided George Grant with "new and diverse material" in the form of Dr. Keyes' recent speeches and enabled Grant to complete his contract with Zondervan Publishing which produced the book by Alan Keyes, ghosted by George Grant, *Our Character, Our Future*.
 - retrieved daily, opened, and sorted AKP mail from the Alexandria PO Box
 - prepared and delivered on a daily basis to UPS or Mailboxes Etc. in Alexandria all shipments (overnight and surface) from the Alexandria office
 - prepared and oversaw the photo duplication of all Matching Fund submissions and campaign file copies (up to 15,000 and more single document pages each submission)
 - organized and managed the manual alphabetization of all check photo copies of contributions received on two occasions which salvaged both the initial FEC Matching Fund Threshold qualification process (the FEC gave the campaign a single weekend to accomplish this task before simply disqualifying the Committee for any Matching Funds), and the May/June/July (Threshold/Non-threshold) submissions
 - prepared and shipped all files from the Alexandria office to St. Paul necessary to meet the Federal audit requirements in good order
 - analyzed, corrected and upgraded computer equipment, software, and workflow problems for the Correspondence Assistant at the Emmitsburg office; provided data entry, software and macro training
 - all ad hoc assignments as needed on a 24 hour basis

98043893642

ALAN KEYES

President '96

Memo to Files
July 8 - August 1996

1. Francis Chester spoke by phone with Dave Racer on Friday, July 5, 1996 and recommended that I call Mr. Racer and try to work out some settlement with him in order to avoid the bankruptcy filing. Dave Racer informed Francis Chester that Matching Funds would not be available to pay my fees until after August 1, 1996. I pointed out to Mr. Chester that the Committee's June FEC filing, reported the receipt in May of over \$300,000 in Matching Funds. I also reminded Mr. Chester that I had been given several previous potential payment dates prior to this one and that the Committee had had funds available to meet the *minimum* agreement since March. Dave Racer drafted a memo to me after his phone conversation with my attorney dated July 5 which emphasizing a "drop dead" date of the following Monday, July 8, if we had not spoken by phone by then. This memo did not reach me until 9 PM Monday evening.
2. I called Dave Racer at home Sunday evening, July 7, 1996 to arrange a convenient time for a phone conference the following morning.
3. Spoke with Dave Racer Monday morning July 8, 1996 c. 10AM to request payment of a minimum of half my current invoice (\$60,000) in order to avoid the bankruptcy filing and permit the Committee to retain my services and meet with Federal auditors at the St. Paul office during the four weeks Federal auditors planned to review Committee records. The audit was scheduled at that time to begin in Minnesota in August.
4. Mr. Racer told me he had just paid over \$100,000 in bills and had no cash or funds available. However, "cash on hand" recorded as of August 1, 1996 in the September 20th FEC report indicates \$92,298.92 available "cash on hand". When I pointed out that we had already received over \$300,000 in Matching Funds referring to the June FEC report, Mr. Racer assured me that the Committee had received "much more than that!" In fact, by that time the Committee had received over half a million dollars in Federal funds and by the end of August it had received over \$611,000.
5. Mr. Racer concluded the conversation saying that he would need time to "mull things over" and that he would get back to me shortly with an answer. Neither Francis Chester nor I heard anything more from Dave Racer until I received a letter dated July 15, 1996 indicating the termination of my services as of July 31, 1996.
6. On July 25 Francis Chester filed the bankruptcy petition in Harrisonburg, VA. On July 30 I moved from 316 Frazer Place, due to the sale of the home I had been renting, to 128 W Main Street.
7. On August 8 Michael Tarone, the Committee's general council, phoned a friend of mine at work requesting that I call him back immediately. When I returned the call that evening, Mr. Tarone invited me to join him for lunch and told me that he had a check for me in the amount of \$10,000. I informed him that I could not accept any funds directly due to the bankruptcy filing. He immediately called and spoke with Francis Chester but informed Mr. Chester that he had check for \$30,000. Mr. Chester gave Mr. Tarone the filing number and the name of the bankruptcy trustee.

sonal credit card, for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee is a contribution unless the payment is exempted from the definition of contribution under 11 CFR 100.7(b)(8). If the payment is not exempted under 11 CFR 100.7(b)(8), it shall be considered a contribution by the individual unless—

(1) The payment is for the individual's transportation expenses incurred while traveling on behalf of a candidate or political committee of a political party or for usual and normal subsistence expenses incurred by an individual, other than a volunteer, while traveling on behalf of a candidate or political committee of a political party; and

(2) The individual is reimbursed within sixty days after the closing date of the billing statement on which the charges first appear if the payment was made using a personal credit card, or within thirty days after the date on which the expenses were incurred if a personal credit card was not used. For purposes of this section, the closing date shall be the date indicated on the billing statement which serves as the cutoff date for determining which charges are included on that billing statement. In addition, "subsistence expenses" include only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

(c) *Treatment as debts.* A political committee shall treat the obligation arising from a payment described in paragraph (b) of this section as an outstanding debt until reimbursed.

(d) *Settlement or forgiveness of the debt.* The individual and the political committee may agree to the total forgiveness of the debt (See 11 CFR 116.8) or a settlement of the debt for less than the entire amount owed (See 11 CFR 116.7), provided that the requirements of 11 CFR 116.7 or 116.8, as appropriate, including the submission of the information specified in these sections and Commission review, are satisfied. The provisions of this part shall not be construed to require the individual to for-

give or settle the debt for less than the entire amount owed.

(e) *Reporting.* The political committee shall continue to report the obligation arising from the payment as a debt in accordance with 11 CFR 104.3(d) and 104.11 until the Commission has completed a review of the debt settlement plan pursuant to 11 CFR 116.7(f) or until the Commission has completed a review of the request to forgive the debt pursuant to 11 CFR 116.8, or until the political committee pays the debt, whichever occurs first.

[55 FR 26386, June 27, 1990, as amended at 56 FR 35911, July 29, 1991]

§116.6 Salary payments owed to employees.

(a) *Treatment as debts or volunteer services.* If a political committee does not pay an employee for services rendered to the political committee in accordance with an employment contract or a formal or informal agreement to do so, the unpaid amount either may be treated as a debt owed by the political committee to the employee or, provided that the employee signs a written statement agreeing to be considered a volunteer, converted to a volunteer services arrangement under 11 CFR 100.7(b)(3). The unpaid amount shall not be treated as a contribution under 11 CFR 100.7.

(b) *Settlement or forgiveness of the debt.* If the unpaid amount is treated as a debt, the employee and the political committee may agree to a settlement of the debt for less than the entire amount owed pursuant to 11 CFR 116.7. The provisions of this part shall not be construed to require the employee to settle the debt for less than the entire amount owed.

(c) *Reporting.* If the unpaid amount is treated as a debt, the political committee shall continue to report the debt in accordance with 11 CFR 104.3(d) and 104.11 until the Commission has completed a review of the debt settlement plan pursuant to 11 CFR 116.7(f) or until the employee agrees to be considered a volunteer, or until the political committee pays the debt, whichever occurs first.

§116

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Kristin Regina Kazyak

Multimedia
Video Editing
CR-ROM Development
Customized Automation
Local Area Networks
Communications
Word/Data/Graphics
Macro Programming
Desktop Publishing
Office Synergistics
Telecomputing

9 8 0 4 3 8 9 3 6 4 5

CAMPAIGN ACTIVITY

<i>Miller for Senate</i>	1994	Delegate to the Republican Convention Richmond, VA
<i>McSarrow for Congress</i>		Campaign and precinct work
<i>Farris for Lt. Governor</i>	1993	Campaign and precinct work
<i>Bush for President</i>	1992	Republican Elections Officer, Drainsville District
<i>McSarrow for Congress</i>		Campaign and precinct work
<i>Buchanan for President</i>		Campaign Volunteer, set up software and macro programmed Bill Hall's Correspondence Dept. mail-merge database
<i>Bush for President</i>	1988	Republican Book Judge, District 5, Precinct 3, Columbia, MD
		Assistant to Robert M. Kimmitt, Esq. (Partner, <i>Sidley & Austin</i>) worked in the pre and post-election Transition effort, which included preparation of Transition Books for each Federal Department and Agency
<i>Keyes for Senate</i>	1988	Media Volunteer
<i>Gresham for Assembly</i>	1984	Precinct coordination and canvassing, LA County
<i>Reagan for President</i>	1984	Volunteer and precinct coordinator, Ojai, CA
<i>Allen for Assembly</i>	1978	Campaign volunteer and precinct work
<i>Reagan for President</i>	1976	Reagan Primary and Election, Volunteer precinct coordinator, Columbia, MD
<i>Students for Reagan</i>	1972	Campus Coordinator, Thomas Aquinas College, California
<i>Young Americans for Freedom</i>	1968	Chairman, Notre Dame Academy, Washington, DC

REFERENCES:

William Gribbin
former Assistant to Vice President Quayle for
Legislative Affairs
current Senior Policy Analyst, House Republican Policy
Committee
202-225-6168

Louis C. Gasper
former President of GHMA
current Assistant Professor and Director of the Center
for Business Ethics
817-267-6599

Robert M. Kimmitt, Esq.
former Under Secretary of State for Public Affairs and
Ambassador to Germany
current Managing Director LEHMAN BROTHERS
DC: 202-452-4747
NY: 212-298-6585

Patrick Fagan
former Deputy Assistant Secretary HHS
current Senior Policy Analyst Heritage Foundation
202-546-4400

KRISTIN REGINA KAZYAK

316 Frazer Place

Front Royal, Virginia 22630

800-575-7874

OBJECTIVE SPECIAL INTERESTS

Multimedia digitalized video graphics and animation support position in programming and production. Multimedia GUI/VUI systems, software applications, CD-ROM development, form design, and presentations.

INTEGRATED MULTIMEDIA SYSTEMS

CURRENT '91-'93

Technology, Management & Analysis Corporation: project/application analysis, design, development, editing, and support for: on-line animated interactive video training programs (*WindowsNT, NEC Image, DEC Alpha, SUN Microsystems*)
Designed and produced the user manual and training presentations for numerous projects including the USIA project. Used or created 3-D, color, and grey image graphics, scanned, screen captured images, illustrations, charts, graphs and line drawings

'87-'93

Institute for Media Education: board member, special projects assistant, multimedia systems consultant

'87/'88

St. Mark's, Hyattsville, Maryland: directed & produced training videos

ONGOING

- Regional Director, Kodak Mobile Holy Shroud Exhibit (MD, DC, VA, WV)
- book contracts (automated): co-editor with author, Fr. John A. Hardon, SJ
- substitute teacher (Math, Religion, Science, English, Social Studies, etc.)

BOARD APPOINTED CONSULTANT

1986

Mount de Sales, Inc. (Fall): Financial Resources Director
Mount de Sales, Inc. (Spring): Human Resources - Personnel and Admissions Director

COMPUTER APPLICATIONS DEVELOPMENT & SUPPORT CONSULTING

1990

Hughes Network Systems: Satellite systems & airphone project user manuals and graphics support
Emeritus Foundation: Proposal editor
ARINC Companies (Annapolis): Meteorological Data Communications & Retrieval System (MDCRS) project, documentation and graphics support
Executive Resources Associates / Drug Enforcement Agency: custom e-forms
Health Systems Research, Inc.: Lotus spreadsheet design & development
U.S. Department of Education - OERI: conference database design & support

1989

Sidley & Austin: Secretary to Robert M. Kimmitt (Partner)

'87-'88

Government National Mortgage Association (GNMA): Consultant for Louis C. Gasper — LAN installation and management

1986

International Finance Corporation: analysis of MIDAS banking system

1977

World Bank (Staff: 1977-1984): office automation & procurement; rationalization assistant; personnel; payroll

24 HOUR SATELLITE PROGRAMMING

1984

Santa Fe Communications, TV KHS-46, Hollywood, California:
Executive Officer and Special Advisor to the President:

EDUCATION

M.A. in Communications, 1985, University of Thomas Aquinas, Rome
B.A. in Classical Liberal Arts, 1980, Thomas Aquinas College, California

98043893647

KRISTIN REGINA KAZYAK

316 Frazer Place

Front Royal, Virginia 22630

800-575-7874

Work with the following applications includes:

- technical support
- beta testing
- analysis (end user & workflow)
- application design & programming (4GL, Object-Oriented)
- desktop publishing (proposals & documentation)
- training
- configuration & program management

Cross platform usage of these applications on all available Operating Systems and hardware including 486/66's, WindowsNT (beta), Windows 3x, DOS 5&6x/Novell Netware, UNIX SUN & SUNSelect/SCO [Solbourne 700/900, Tricord, SUN4 Workstations], DEC Alpha, NEC Image

- beta testing & software preview for WordPerfect Corp.'s WORDPERFECT
 - for Windows 5.2. & 6.0
 - for DOS 6.0
 - Presentations for DOS & Windows 6.0
 - InForms 1.0; PARADOX/ORACLE/DATAPERFECT/ACCESS/INFORMIX/ETC.
 - Office 4.0 (cross platform - UNIX [SCO/SUN]/Novell LAN)
 - DataPerfect RDBMS
- GUPTA for Windows: designed the GUI for *Corporate Information System*, an ORACLE application
- INFORMIX RDBMS, ISQL: designed and programmed special conversion utilities from *WordPerfect* to *Informix*
- ORACLE 6 & 7 RDBMS (all platforms; parallel processing), SQL: designed & programmed special conversion utilities from *Word Perfect* to ORACLE
- Servio's OBJECT DBMS (ODBMS)
- PARADOX FOR WINDOWS
- *VideoEditor* (and other Video editing software)

90043893648

PERSONAL ACHIEVEMENTS

Washington Academy of Sciences
Treasurer, Joint Board on Science and Engineering Education for the Greater Washington Area, 1989-92
Exhibit Manager, for the Mobile Kodak Exhibit STURP/ASSIST, 1988-94
Magi Foundation for Art, 1984 to 1990, Board Member
FCS, Associate
Louisa A. Watson Fellowship, 1977-80
Ruskin School of Art, Oxford University, 1972
Washington Junior Academy of Sciences, 1966

DEMONSTRATED SKILLS

Office and Systems Management, Product Support, Systems Testing and Documentation
Custom Software Applications, Technology Development and Procurement
Exhibit Management
Public Relations, Human Resources and Planning
Mass Media Communications - Television, Video, and Print:
Analysis and criticism of social and political issues
Interview and reporting skills

Languages

Spanish (Semi-fluent), French/Russian/Greek/Latin (Academic)

98043893649

9 8 0 4 3 8 9 3 6 5 0

KRISTIN R. KAZYAK

JULY 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 5,399.93	
04-30-96			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)		
05-31-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)		
06-30-96					\$ 7,100.00	\$ 7,100.00	(TBD)	\$ 2,000.00	\$ 3,300.00
07-31-96					\$ 7,100.00	\$ 7,100.00	(TBD)	\$ 1,650.00	\$ 3,300.00
Subtotals	\$ 0.00	\$ 3,300.00	\$ 3,300.00	\$28,400.00					
Totals				\$33,000.00	\$85,200.00	\$ 118,200.00	\$ 0.00	\$ 14,699.93	\$ 6,600.00
Grand Total						\$ 124,800.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.



KRISTIN R. KAZYAK

9 8 0 4 3 8 9 3 6 5 1

JUNE 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 5,399.93	
04-30-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)		
05-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)		
06-30-96					\$ 7,100.00	\$ 7,100.00	(TBD)	\$ 2,000.00	\$ 3,300.00
07-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00			
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$23,100.00					
Totals				\$36,300.00	\$85,200.00	\$ 121,500.00	\$ 0.00	\$ 13,049.93	\$ 3,300.00
Grand Total						\$ 124,800.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

KRISTIN R. KAZYAK

9 8 0 4 3 8 9 3 6 5 2

MAY 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 5,399.93	
04-30-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)		
05-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)		
06-30-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00			
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$23,100.00					
Totals				\$36,300.00	\$78,100.00	\$ 114,400.00	\$ 0.00	\$ 11,049.93	\$ 0.00
Grand Total						\$ 114,400.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

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KRISTIN R. KAZYAK

APRIL 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 5,399.93	
04-30-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)		
05-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00			
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$19,800.00					
Totals				\$33,000.00	\$71,000.00	\$ 104,000.00	\$ 0.00	\$ 11,049.93	\$ 0.00
Grand Total						\$ 104,000.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

KRISTIN R. KAZYAK

9 8 0 4 3 8 9 3 6 5 4

MARCH 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 5,399.93	
04-30-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00			
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$16,500.00					
Totals				\$29,700.00	\$63,900.00	\$ 93,600.00	\$ 0.00	\$ 11,049.93	\$ 0.00
Grand Total						\$ 93,600.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

KRISTIN R. KAZYAK

9 8 0 4 3 8 9 3 6 5 5

FEBRUARY 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,500.00	
03-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)		
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$13,200.00					
Totals				\$26,400.00	\$56,800.00	\$ 83,200.00	\$ 0.00	\$ 5,650.00	\$ 0.00
Grand Total						\$ 83,200.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

KRISTIN R. KAZYAK

9 8 0 4 3 8 9 3 6 5 6

JANUARY 1996

Auth Date	Minim* 0-30	Minim* 31-60	Minim* 61-90	Minim* 90 -	Pro Fees	TOTAL Pro Fees	Expenses	Expenses Paid	Sal Paid
07-31-95						\$0.00	(TBD)	\$ 399.21	
08-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
09-30-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)		
10-31-95				\$ 3,300.00	\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 2,500.00	
11-30-95			\$ 3,300.00		\$ 7,100.00	\$ 10,400.00	(TBD)		
12-31-95		\$ 3,300.00			\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 1,050.00	
01-31-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)	\$ 600.00	
02-29-96	\$ 3,300.00				\$ 7,100.00	\$ 10,400.00	(TBD)		
Subtotals	\$ 6,600.00	\$ 3,300.00	\$ 3,300.00	\$ 9,900.00					
Totals				\$23,100.00	\$49,700.00	\$ 72,800.00	\$ 0.00	\$ 4,150.00	\$ 0.00
Grand Total						\$ 72,800.00			

* Reflects initial contract to accept a minimum due on the monthly fee each month until the Committee received funds to pay the fee in full.

REPORT OF RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENT

FEB 23 12 48 PM '96
COMM-FED
NAT. FORM

4

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE PREVIOUS EDITIONS TYPE OR PRINT	1. NAME OF COMMITTEE (in full) ALAN KEYES FOR PRESIDENT '96, INC	2. IDENTIFICATION NUMBER C-00803214
	ADDRESS (number and street) ☒ Check if different than previously reported 2515 WHITE BEAR AVENUE SUITE 8A-301	3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR: ☒ Primary ☐ General
	CITY, STATE and ZIP CODE ST PAUL, MINNESOTA 55109-5159	
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	☐ Amendment for (Report)	☒ Monthly Report (month) JANUARY, 1996
	☐ April 15 Quarterly Report	☐ Twelfth Day Before Election
	☐ July 15 Quarterly Report	☐ Thirtieth Day After Election
	☐ October 15 Quarterly Report	☐ Termination Report
TYPE OF ELECTION PRESIDENTIAL		STATE NATION
		ELECTION DATE 1/5/96

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

COVERING PERIOD FROM **JANUARY 1, 1996** THROUGH **JANUARY 31, 1996**

SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	49,121.67
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	387,629.84
	8. SUBTOTAL (Add Line 6 and 7)	436,751.51
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	270,328.07
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	166,423.44
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	UNDETERMINED
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	492,655.87
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	- 0 -
	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17a Column B)	387,629.84
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	270,328.07

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

TYPE OR PRINT NAME OF TREASURER ASSISTANT TREASURER

MARY PARKER LEWIS

SIGNATURE OF TREASURER ASSISTANT TREASURER

Mary Parker Lewis

DATE

2-20-96

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 378-3120

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

All previous versions of FEC Form 3P are obsolete and should no longer be used.

FEC FORM 3P (2/83)

NAME OF COMMITTEE (in Full)

ALAN KEYES FOR PRESIDENT '96, INC

REPORT COVERING THE PERIOD:

From: JAN 1, 1996 Through: JAN 31, 1996

I. RECEIPTS

16. FEDERAL FUNDS (Itemize on Schedule A-P)

16

17. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

387,629.84

387,629.84

17(a)

(b) Political Party Committees

17(b)

(c) Other Political Committees

17(c)

(d) The Candidate

17(d)

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)).

387,629.84

387,629.84

17(e)

18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

18

19. LOANS RECEIVED:

(a) Loans Received From or Guaranteed by Candidate

19(a)

(b) Other Loans

19(b)

(c) TOTAL LOANS (Add 19(a) and 19(b))

19(c)

20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):

(a) Operating

20(a)

(b) Fundraising

20(b)

(c) Legal and Accounting

20(c)

(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)).

20(d)

21. OTHER RECEIPTS (Dividends, Interest, etc.)

21

22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21).

387,629.84

387,629.84

22

II. DISBURSEMENTS

23. OPERATING EXPENDITURES

93,712.30

93,712.30

23

24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

15,137.09

15,137.09

24

25. FUNDRAISING DISBURSEMENTS

161,472.68

161,472.68

25

26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS

26

27. LOAN REPAYMENTS MADE:

(a) Repayments of Loans Made or Guaranteed by Candidate

27(a)

(b) Other Repayments

27(b)

(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)).

27(c)

28. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

28(a)

(b) Political Party Committees

28(b)

(c) Other Political Committees

28(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))

28(d)

29. OTHER DISBURSEMENTS

29

30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29).

270,322.07

270,322.07

30

III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)

31

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Ameritech Saginaw MI Nature of debt:	phones	0.00	79.22	0.00	79.22
Aristotle 205 Pennsylvania Ave SE Washington DC 20003 Nature of debt:	computer software	0.00	2535.00	0.00	2535.00
Jill Braden 3001 Park Cir Dr Alexandria VA 22302 Nature of debt:	secretarial fees	0.00	9040.63	0.00	9040.63
Bruce Lood Productions, Inc 2254 Chenoweth Ct Rockford IL 61107 Nature of debt:	broadcast productions	0.00	7791.25	0.00	7791.25
Captain Hook Hotel 5th & K Streets Anchorage AK 99501 Nature of debt:	travel	0.00	891.38	0.00	891.38
Catterton Printing 24 Industrial Park Dr Waldorf MD 20601 Nature of debt:	printing	0.00	37580.14	8002.32	29577.82
CBI PO Box 650 Thornburg VA 22565 Nature of debt:	mail processing	1794.90	2171.47	1794.90	2171.47
CHH Inc PO Box 4766 Chicago IL 60680-4766 Nature of debt:	computer services	417.37	0.00	0.00	417.37

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Intelli-Check 44 Cordell Road Schenectady NY 12304			01 31 96		
Nature of debt:	security	428.00	0.00	0.00	428.00
Iowa State Center Iowa State University Ste 4 - Scheman Ames IA 50011			01 31 96		
Nature of debt:	facility expenses	419.75	0.00	0.00	419.75
Iowa State University Payment Processing Ctr PO Box 10380 Des Moines IA 50306-0380			01 31 96		
Nature of debt:	studio rental	147.39	0.00	0.00	147.39
IRU Corporation 3540 Forest Lake Dr Uniontown OH 44685			01 31 96		
Nature of debt:	telemarketing	15171.55	13564.40	15172.37	13563.58
K&K Insurance Group 1712 Magnavox Way PO Box 2338 Fort Wayne IN 46801-2338			01 31 96		
Nature of debt:	campaign liability ins	1069.50	0.00	0.00	1069.50
Kristin R. Kazyak 316 Erzer Place Front Royal VA 22360			01 31 96		
Nature of debt:	professional fees	0.00	23100.00	0.00	23100.00
KKCM AM Radio MD 54 1107 Hazeltine Blvd Suite 520 Chaska MN 55318-1043			01 31 96		
Nature of debt:	studio rental	74.14	0.00	0.00	74.14
Klaus Nijhuis 50 Elm St Manchester NH 03101			01 31 96		
Nature of debt:	office exp reimb	525.00	0.00	0.00	525.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Larry McClaine 4169 Botanical Dr St Louis MO 63110 Nature of debt:	phones	0.00	275.24	0.00	275.24
Mary Parker Lewis 4700 Surry Place Alexandria VA 22304 Nature of debt:	travel	0.00	16568.20	0.00	16568.20
Lion & Fox Studios 7532 Fullerton Ct Springfield VA 22153 Nature of debt:	audio product	1890.00	0.00	0.00	1890.00
Mailbag 201 Commerce Drive Upper Marlboro MD 20772 Nature of debt:	mailshop services	0.00	6422.50	6422.50	0.00
MCI NETWORKMCI Conferencing PO Box 85025 Louisville KY 40285-5025 Nature of debt:	phones	3777.26	0.00	0.00	3777.26
MCI NETWORKMCI Conferencing PO Box 85025 Louisville KY 40285-5025 Nature of debt:	phones	904.78	843.79	0.00	1748.57
McKasy Travel 230 American Natl Bank Bldg St Paul MN 55101 Nature of debt:	travel	0.00	129.00	0.00	129.00
Metro Productions 6005 Chapel Hill Road Raleigh NC 27607 Nature of debt:	printing services	1754.79	0.00	0.00	1754.79

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Orion Direct Inc. 360 Herndon Pkwy - Ste 900 Herndon VA 22070			01 31 96		
Nature of debt:	mailshop services	0.00	16000.00	16000.00	0.00
Paper Valley Hotel & Conference Center 333 W College Ave Appleton WI 54911			01 31 96		
Nature of debt:	lodging	200.88	6.02	0.00	206.90
Patrick J. McGuire 2845 Mirage Dr Colorado Springs CO 80920			01 31 96		
Nature of debt:	professional services	1400.00	300.00	1700.00	0.00
Paulist Press Book Store 801 Baker St Costa Mesa CA 92626			01 31 96		
Nature of debt:	event books	1115.21	0.00	0.00	1115.21
William Perry 940 Eagle Cir N Colorado Springs CO 80919			01 31 96		
Nature of debt:	event	0.00	3675.90	0.00	3675.90
David Quackenbush 325 E Oakview Ave Oakview CA 93002			01 31 96		
Nature of debt:	fundraising fees	0.00	10202.89	0.00	10202.89
Quinn, Lynch & Lobel, PC 1636 Connecticut Ave NW Washington DC 20009			01 31 96		
Nature of debt:	professional services	19568.08	11070.00	12348.55	18289.53
Radisson Inn 800 S 3rd St Bismarck ND 58504			01 31 96		
Nature of debt:	event SD	435.00	0.00	0.00	435.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Raven Air 4201 N Main Ft Worth TX 76106			01 31 96		
Nature of debt:	air travel	13041.21	0.00	0.00	13041.21
Reed Envelope Co. 6310 G Gravel Ave Alexandria VA 22310			01 31 96		
Nature of debt:	printing	0.00	962.35	0.00	962.35
Republican Party of Iowa 521 E Locust St Des Moines IA 50309			01 31 96		
Nature of debt:	data base	946.30	0.00	0.00	946.30
Response Unlimited c/o The Old Plantation Rt 5 - Box 251 Waynesboro, VA 22980- 9111			01 31 96		
Nature of debt:	fundraising expenses	64256.05	21844.04	57806.93	28293.16
Chip Rohlke 1812 Park Ave Titusville FL 32780			01 31 96		
Nature of debt:	copies	283.87	0.00	0.00	283.87
Ramada Hotel St Paul 1870 Old Hudson Rd St Paul MN 55119			01 31 96		
Nature of debt:	event rent	0.00	134.07	0.00	134.07
Ronald Reagan Presidential Library Gift Shop 40 Presidential Drive Simi Valley CA 93065			01 31 96		
Nature of debt:	books	98.53	0.00	0.00	98.53
Saber Communications, Inc. 108 Stonehouse Road Fredericksburg VA 22406			01 31 96		
Nature of debt:	data base	225.84	0.00	0.00	225.84
Spiegel Enterprises Inc 1849 E Willow Tree Cir Gilbert AZ 85234			01 31 96		
Nature of debt:	audio product	0.00	5695.44	0.00	5695.44

98043893663

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
St Joseph Communications, Inc Wholesale Division PO Box 720 West Covina	audio product	1368.00	0.00	0.00	1368.00
Nature of debt:					
Roger Schoers 1666 White Bear Ave Suite 150 St Paul MN 55106	audio tapes	50.00	0.00	0.00	50.00
Nature of debt:					
Southwest Policy Group 2907 N 2nd St Phoenix AZ 85012	professional fees	20.00	20445.00	0.00	20445.00
Nature of debt:					
Spiegel Enterprises, Inc 1849 Willow Tree Cir Gilbert AZ 85234	audio product	5731.58	0.00	0.00	5731.58
Nature of debt:					
Stage, Inc 170 High Street SE Salem OR 97301	event venue	387.50	0.00	0.00	387.50
Nature of debt:					
Jeannine Stroth 401 S Carson St Carson City NE 89710	event	0.00	1241.92	0.00	1241.92
Nature of debt:					
C. Michael Tarone, Esq. 1815 H St NW - Ste 900 Washington DC 20006	professional fees	29791.67	13800.70	2500.00	41092.37
Nature of debt:					
Techprints, Inc 1600 Roswell St - Ste 10-B Smyrna GA 30080	business cards	246.75	0.00	0.00	246.75
Nature of debt:					

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REPORT RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENTRECEIVED
FEDERAL ELECTION COMMISSION
APR 22 11 16 AM '96

5

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE FEC MAILING LABEL OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) ALAN KEYES FOR PRESIDENT '96, INC.		2. IDENTIFICATION NUMBER C-00303214		
	ADDRESS (number and street) ☐ Check if different than previously reported 2515 WHITE BEAR AVENUE SUITE 8A-301		3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR:		
	CITY, STATE and ZIP CODE ST PAUL, MINNESOTA 51109-5159		☒ Primary ☐ General		
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	☐ Amendment for (Report)		☒ Monthly Report (month) MARCH		
	☐ April 15 Quarterly Report		☐ January 31 Year-end Report		
	☐ July 15 Quarterly Report		☐ Termination Report		
	☐ October 15 Quarterly Report		☐ Twelfth Day Before Election		
		☐ Thirtieth Day After Election		TYPE OF ELECTION PRESIDENT OF U.S.A.	
		NATION		ELECTION DATE 11/5/96	

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD		FROM MARCH 1, 1996	THROUGH MARCH 31, 1996
SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		146,784.65
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)		340,968.08
	8. SUBTOTAL (Add Line 6 and 7)		487,752.73
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)		344,374.68
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)		143,378.05
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)		UNDETERMINED
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)		1,291,317.71
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)		UNKNOWN
	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)		1,077,669.02
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)		473,372.08

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

TYPE OR PRINT NAME OF TREASURER ASSISTANT TREASURER
MARY PARKER LOUIS

SIGNATURE OF TREASURER ASSISTANT TREASURER

DATE

*Mary Parker Louis***4-20-96**

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

All previous versions of FEC Form 3P are obsolete and should no longer be used.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 376-3120

FEC FORM 3P (2-83)

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE (in Full)		REPORT COVERING THE PERIOD:		
ALAN KEYES FOR PRESIDENT '96, Inc.		From: 3/1/96	Through: 3/31/96	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS				
16. FEDERAL FUNDS (Itemize on Schedule A-P)		35,100.22	35,100.22	16
17. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		305,867.86	1,077,719.02	17(a)
(b) Political Party Committees				17(b)
(c) Other Political Committees				17(c)
(d) The Candidate				17(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d))		305,867.86	1,077,719.02	17(e)
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES				18
19. LOANS RECEIVED:				
(a) Loans Received From or Guaranteed by Candidates				19(a)
(b) Other Loans				19(b)
(c) TOTAL LOANS (Add 19(a) and 19(b))				19(c)
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):				
(a) Operating				20(a)
(b) Fundraising				20(b)
(c) Legal and Accounting				20(c)
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c))				20(d)
21. OTHER RECEIPTS (Dividends, Interest, etc.)				21
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21)		340,968.08	1,112,819.24	22
II. DISBURSEMENTS				
23. OPERATING EXPENDITURES		155,105.00	473,372.08	23
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		21,784.28	56,089.01	24
25. FUNDRAISING DISBURSEMENTS		167,435.40	489,051.77	25
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS				26
27. LOAN REPAYMENTS MADE:				
(a) Repayments of Loans Made or Guaranteed by Candidate				27(a)
(b) Other Repayments				27(b)
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b))				27(c)
28. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees		50.00	50.00	28(a)
(b) Political Party Committees				28(b)
(c) Other Political Committees				28(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))		50.00	50.00	28(d)
29. OTHER DISBURSEMENTS				29
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)		344,374.68	1,018,562.86	30
III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)				
31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)				31

NOTE TO MARCH 1996 FEC REPORT

There is reported in this March 1996 filing all known claims of indebtedness which heretofore have been unreported because they were previously unknown, undocumented or disputed. We have erred on the side of disclosure whether or not there was a determination by the committee that the claim is substantiated. In order to finally identify any and all such contingent liabilities, extensive efforts were undertaken to contact and request data from vendors, service providers, and staff to quantify the claims. The results of this effort are reflected in this report, which compiles asserted indebtedness irrespective of documentation or the committee's belief as to whether there is any legitimate basis for the claim. Claims for compensation based on informal agreement make up a substantial portion of this new debt. This report is made in an effort to meet a strict standard for disclosure of even asserted and unsubstantiated obligations.

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Joyce Downey PO Box 3023 Scottsdale AZ 85271 Nature of debt:	professional fees	0.00	03 31 96 13500.00	0.00	13500.00
Joyce Downey PO Box 3023 Scottsdale AZ 85271 Nature of debt:	telephone	0.00	03 31 96 1718.17	0.00	1718.17
Kansans for Life 1301 N West St Suite 5 Wichita KS 67203 Nature of debt:	books	0.00	03 31 96 848.63	0.00	848.63
Kam Autoproducts Inc. PO Box 1005 Green Bay WI 54307 Nature of debt:	printing	0.00	03 31 96 1018.24	0.00	1018.24
Kent A Franklin 29 Kensington Ct Appleton WI 54915 Nature of debt:	advertising	0.00	03 31 96 345.09	0.00	345.09
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630 Nature of debt:	professional services	0.00	03 31 96 63900.00	0.00	63900.00
Larsen's Printing 1300 Pierce St Sioux City IA 51105 Nature of debt:	printing	0.00	03 31 96 784.00	0.00	784.00
Lercy Rahn 3230 N Onelda St Appleton WI 54911 Nature of debt:	advertising	0.00	03 31 96 200.00	0.00	200.00
Liberty Marketing 523 E 9th St Schuyler NE 68661 Nature of debt:	marketing consultant	0.00	03 31 96 6000.00	0.00	6000.00
Linda Saubers 4215 Beaufort Dr Brookfield WI 53045 Nature of debt:	postage	0.00	03 31 96 130.45	0.00	130.45

DAVE RACER
HAD THIS
ENTRY
REMOVED
BEFORE HE WOULD
AUTHORIZE
SIGNATURE

98043893668

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Adonal Packaging 425 36th St Sw Grand Rapids MI 49548			03 31 96		
Nature of debt:	event rental	0.00	16470.00	0.00	16470.00
Andy Jackson 100 Cotton Farm Dr Fuguay-barina NC			03 31 96		
Nature of debt:	professional fees	0.00	4990.55	0.00	4990.55
Arlen Williams 1401 N Lagrange Rd Lagrange Park IL 60525			03 31 96		
Nature of debt:	advertisement	0.00	824.00	0.00	824.00
Berlin & Jones Co Inc 2 East Union Ave East Rutherford NJ 07070			03 31 96		
Nature of debt:	printing & envelopes	0.00	877.50	0.00	877.50
Beverly Ballow 2508 Locust St Denton TX 76201			03 31 96		
Nature of debt:	professional fees	0.00	3370.57	0.00	3370.57
Bill Kling Kling Communications 6110 Occoquan Forest Drive Manassas VA 22111			03 31 96		
Nature of debt:	professional fees	0.00	51000.00	0.00	51000.00
Broadcast Services of CO Inc 5945 West Mississippi Av Lakewood CO 80226			03 31 96		
Nature of debt:	studio rental	0.00	711.60	0.00	711.60
California Rep Magazine PO Box 277831 Sacramento CA 95827			03 31 96		
Nature of debt:	advertising	0.00	870.00	0.00	870.00
Carl A Schroeder 705 S 26th St Sheboygan WI 53081			03 31 96		
Nature of debt:	equipment rental	0.00	105.00	0.00	105.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Carla Michele 402 E Highway 121 Lot 303 Lewslville TX 75057			03 31 96	03 26 96	
Nature of debt:	professional fees	0.00	8378.02	1750.00	6628.02
Cell Levatino 67 Capital Place Rensselaer NY 12144			03 31 96		
Nature of debt:	travel	0.00	501.10	0.00	501.10
Cell Levatino 67 Capital Place Rensselaer NY 12144			03 31 96		
Nature of debt:	books	0.00	612.36	0.00	612.36
Charles Phillips 4450 E Cheyenne Mtn BLvd # 344 Colorado Springs CO 80906			03 31 96		
Nature of debt:	fundraising fees	0.00	28530.00	0.00	28530.00
Clint Austin 2015 Big Shanty Dr Kennesaw GA 30144			03 31 96		
Nature of debt:	contulant fees	0.00	1000.00	0.00	1000.00
Clint Austin 2015 Big Shanty Dr Kennesaw GA 30144			03 31 96		
Nature of debt:	fundraising expense	0.00	2079.60	0.00	2079.60
Conus Communications 3415 University Ave Minneapolis MN 55414			03 31 96		
Nature of debt:	television	0.00	2025.00	0.00	2025.00
Crepeau & Allen 2501 West Ash Columbia MO 65203			03 31 96		
Nature of debt:	legal fees	0.00	975.00	0.00	975.00
D'Vegro Computers 1102 Villa Green Ct Raleigh NC 27612			03 31 96		
Nature of debt:	computers	0.00	6300.00	0.00	6300.00
Dan Gutzlich 2907 N Second St Phoenix AZ 85012			03 31 96		
Nature of debt:	professional fees	0.00	26500.00	0.00	26500.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Daniel L Cox 11237 Simmons Rd Taneytown MD 21787 Nature of debt:	professional fees	0.00	2000.00	0.00	2000.00
David A Thompson 6919 73rd Dr NE Marysville WA 98270 Nature of debt:	fundraising	0.00	180.00	0.00	180.00
David G Racer Jr 1535 Barclay St St Paul MN 55106 Nature of debt:	fundraising expense	0.00	867.20	0.00	867.20
David G Racer Jr 1535 Barclay St St Paul MN 55106 Nature of debt:	professional fees	0.00	7500.00	3000.00	4500.00
Day-Timer PO Box 27001 Lehigh PA 18002 Nature of debt:	office supplies	0.00	73.35	0.00	73.35
Dixie Patterson 6123 No 28 St Phoenix AZ 85016 Nature of debt:	clerical salary	0.00	5000.00	0.00	5000.00
Donald Hilbig 1128 Partridge Av Beloit WI 53511 Nature of debt:	advertising	0.00	150.00	0.00	150.00
George Uribe PO Box 68021 Raleigh NC 27613 Nature of debt:	travel	0.00	2052.59	0.00	2052.59
George Uribe PO Box 68021 Raleigh NC 27613 Nature of debt:	professional fees	0.00	67812.90	0.00	67812.90

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Georgia Del Mazo 3760 Brooklake Road Salem OR 97303			03 31 96		
Nature of debt:	relocation & travel reimbursement	0.00	13599.20	0.00	13599.20
Georgia Del Mazo 3760 Brooklake Road Salem OR 97303			03 31 96		
Nature of debt:	professional services	0.00	21724.00	0.00	21724.00
Grace Van Diesl HC32 Box 8661- A Wasilla AK 99654			03 31 96		
Nature of debt:	postage	0.00	288.92	0.00	288.92
Hal Stevenson 1305 Fairview Dr Columbia SC 29205			03 31 96	03 21 96	
Nature of debt:	event	0.00	7422.00	2000.00	5422.00
Ian Ivey 1410 State Av Coraopolis PA 15108			03 31 96	03 18 96	
Nature of debt:	travel	0.00	445.88	0.00	445.88
James Phillips PO Box 5165 Culver City CA 90231			03 31 96	03 16 96	
Nature of debt:	professional fees	0.00	9000.00	2000.00	7000.00
Joe Glover c/o Baaseiah 7554 Sand St Fort Worth TX			03 31 96		
Nature of debt:	professional fees	0.00	10000.00	0.00	10000.00
John Slack c/o John Keenan Esq. 14-12th Av Solongbranch Station Suite 216 Nampa ID 83853			03 31 96		
Nature of debt:	wages	0.00	3350.00	0.00	3350.00
Joon Park Liberty University Box 23026 Lynchburg VA 24506			03 31 96		
Nature of debt:	professional fees	0.00	2000.00	0.00	2000.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Joyce Downey PO Box 3023 Scottsdale AZ 85271			03 31 96		
Nature of debt:	telephone	0.00	1718.17	0.00	1718.17
Joyce Downey PO Box 3023 Scottsdale AZ 85271			03 31 96		
Nature of debt:	professional fees	0.00	13500.00	0.00	13500.00
Kansans for Life 1301 N West St Suite 5 Wichita KS 67203			03 31 96		
Nature of debt:	books	0.00	848.63	0.00	848.63
Karn Autoproducts Inc. PO Box 1005 Green Bay WI 54307			03 31 96		
Nature of debt:	printing	0.00	1018.24	0.00	1018.24
Kenl A. Franklin 29 Kensington Ct Appleton WI 54915			03 31 96		
Nature of debt:	advertising	0.00	345.09	0.00	345.09
Larsen's Printing 1300 Pierce St Sioux City IA 51105			03 31 96		
Nature of debt:	printing	0.00	784.00	0.00	784.00
Leroy Rahn 3230 N Oneida St Appleton WI 54911			03 31 96		
Nature of debt:	advertising	0.00	200.00	0.00	200.00
Liberty Marketing 523 E 9th St Schuyler NE 68661			03 31 96		
Nature of debt:	marketing consultant	0.00	6000.00	0.00	6000.00
Linda Saubers 4215 Beaufort Dr Brookfield WI 53045			03 31 96		
Nature of debt:	postage	0.00	130.45	0.00	130.45
Lloyd Thede 9261 N Pioneer Rd Appleton WI 54956			03 31 96		
Nature of debt:	advertising	0.00	475.00	0.00	475.00

ENTRY

DELETE

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Lon Mabon PO Box 9127 Brooks OR 97305			03 31 96		
Nature of debt:	professional fees	0.00	27000.00	0.00	27000.00
Loretta Neet 898 S 38th St Springfield OR 97478			03 31 96		
Nature of debt:	travel	0.00	8360.43	0.00	8360.43
Mail Management / America Rt 221 Forest Square Forest VA 24551			03 31 96	03 19 96	
Nature of debt:	printing	0.00	15067.73	14560.00	507.73
Mark Skogerboe 1924 River Road East Grand Forks Mn 56721			03 31 96	03 31 96	
Nature of debt:	professional fees	0.00	9732.99	1687.14	8045.85
Mark Skogerboe 1924 River Road East Grand Forks Mn 56721			03 31 96		
Nature of debt:	travel	0.00	9972.57	0.00	9972.57
Mary H Reilly 65 River Drive Appleton WI 54915			03 31 96		
Nature of debt:	event expense	0.00	577.50	0.00	577.50
Mary Parker Lewis 4700 Surry Place Alexandria VA 27304			03 31 96		
Nature of debt:	professional services	0.00	85000.00	0.00	85000.00
Mike Rustin 18207 Heritage Lane Minnetonka MN 55345			03 31 96		
Nature of debt:	fundraising expense	0.00	3308.08	0.00	3308.08
Mike Rustin 18207 Heritage Lane Minnetonka MN 55345			03 31 96		
Nature of debt:	event rental	0.00	3700.00	0.00	3700.00
Network MCI PO Box 85025 Louisville KY 40285			03 31 96		
Nature of debt:	telephone	0.00	904.78	0.00	904.78

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SCHEDULE D-P
ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Patricia Johnson 27511 Bocina Mission Viejo CA 92692 Nature of debt:	travel	0.00	5317.11	960.73	4356.38
Patrick McGuire PM Productions 2488 Mirage Dr Colorado Springs CO 80920 Nature of debt:	professional fees	0.00	29000.00	0.00	29000.00
Paul Ehemberger 523 E 9th St Schuyler NE 68661 Nature of debt:	fundraising	0.00	172.00	0.00	172.00
Paul Ehemberger 523 E 9th St Schuyler NE 68661 Nature of debt:	fundraising	0.00	3801.00	0.00	3801.00
Paul Ehemberger 523 E 9th St Schuyler NE 68661 Nature of debt:	travel & phones	0.00	6926.39	0.00	6926.39
PIP Publishing 12011 West Silver Spring Dr Milwaukee WI 53225 Nature of debt:	sound system	0.00	443.10	0.00	443.10
QMG c/o Baaseiah 7554 Sand St Fort Worth TX Nature of debt:	rent	0.00	21690.19	0.00	21690.19
QMG c/o Baaseiah 7554 Sand St Fort Worth TX Nature of debt:	fundraising	0.00	87907.16	0.00	87907.16
Reed Skogerboe 6313 Longfellow Av So Richfield MN 55423 Nature of debt:	postage	0.00	155.00	0.00	155.00
Reed Skogerboe 6313 Longfellow Av So Richfield MN 55423 Nature of debt:	travel	0.00	369.00	0.00	369.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Rhineland Flying Serv Inc 3400 Airport Dr PO Box 501 Rhineland WI 54501 Nature of debt:	travel	0.00	705.08	0.00	705.08
Richard Nixon Library & Birthplace 18001 Yorba Linda Blvd Yorba CA 92686 Nature of debt:	books	0.00	584.00	0.00	584.00
Richard Thayer c/o Sandi Boehr PO Box 57 Ebling KS 67041 Nature of debt:	telephone	0.00	68.57	0.00	68.57
Robert F Ellis Jr 1128 Guns Road Green Bay WI 54311 Nature of debt:	advertising	0.00	200.00	0.00	200.00
Robert W Buecher PO Box 1684 Dallas TX 75221 Nature of debt:	fundraising expense	0.00	6499.91	0.00	6499.91
Roger Fisher 1502 W Packard Appleton WI 54914 Nature of debt:	advertising	0.00	50.00	0.00	50.00
Sandi Boehr PO Box 57 Ebling KS 67041 Nature of debt:	travel	0.00	1391.44	0.00	1391.44
Sarah Oldham 6905 Washington Av St Louis MO 63130 Nature of debt:	audio tapes	0.00	1779.32	0.00	1779.32
Southwest Policy Group 2907 N Second St Phoenix AZ 85012 Nature of debt:	campaign consulting services	0.00	80000.00	0.00	80000.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Southwestern Bell PO Box 90246 Arlington TX 76004			03 31 96		
Nature of debt:	telephone	0.00	124.18	0.00	124.18
St Charles Insurance 214 Compass Point Dr St Charles MO 63301			03 31 96		
Nature of debt:	event insurance	0.00	306.25	0.00	306.25
Stephen Clouse & Associates 200 So Vine Av Marshfield WI 54449			03 31 96		
Nature of debt:	direct mail	0.00	33098.50	0.00	33098.50
Steve Wark 131 Wengert Av Las Vegas NV 89104			03 31 96		
Nature of debt:	professional fees	0.00	20778.50	0.00	20778.50
Sunjet 557 Sandau San Antonio TX 0			03 31 96		
Nature of debt:	travel	0.00	4546.79	0.00	4546.79
Terry Moffitt 3102 Woodview St High Point NC 27265			03 31 96		
Nature of debt:	professional fees	0.00	9494.47	0.00	9494.47
Us West 6127771987 Minneapolis MN			03 31 96		
Nature of debt:	telephone	0.00	3040.38	0.00	3040.38
US West 5034631818 PO Box 5508 Bismarck ND 58502			03 31 96		
Nature of debt:	telephone	0.00	1543.68	0.00	1543.68
US West 5152219849 PO Box 5508 Bismarck ND 58502			03 31 96		
Nature of debt:	telephone	0.00	54.49	0.00	54.49
US West 6127712311 Minneapolis MN			03 31 96		
Nature of debt:	telephone	0.00	276.07	0.00	276.07

98043893677

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Vince Carr 232 E Allouez Av Green Bay WI 54301			03 31 96		
Nature of debt:	event rental	0.00	9.00	0.00	8.00
Wisconsin Christians United c/o George Meisner 2665 Flacier Dr Green Bay WI 54302			03 31 96		
Nature of debt:	advertising	0.00	280.00	0.00	280.00
		0.00	818840.58	25957.87	792882.71

9 8 0 4 3 8 9 3 6 7 8

JUN 20 4 31 PM '96

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE FEC MAILING LABEL OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) ALAN KEYES FOR PRESIDENT '96, INC		2. IDENTIFICATION NUMBER C - 00303214		
	ADDRESS (number and street) ☐ Check if different than previously reported 2515 WHITE BEAR AVENUE # 8A-301		3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR:		
	CITY, STATE and ZIP CODE ST PAUL, MINNESOTA 55109-5159		☒ Primary ☐ General		
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	☐ Amendment for (Report)		☒ Monthly Report (month) MAY 1996		
	☐ April 15 Quarterly Report		☐ January 31 Year-end Report		
	☐ July 15 Quarterly Report		☐ Termination Report		
	☐ October 15 Quarterly Report		☐ Twelfth Day before Election		
		☐ Thirtieth Day After Election		TYPE OF ELECTION PRIMARY	
		NATION		ELECTION DATE 8/12/96	
COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS					
5. COVERING PERIOD		FROM MAY 1, 1996	THROUGH MAY 31, 1996		
SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		74,467.33		
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)		292,431.93		
	8. SUBTOTAL (Add Line 6 and 7)		367,099.26		
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)		231,084.47		
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)		136,014.79		
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)		59,529.31		
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)		1,137,464.36		
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)		1,243,784.27		
	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)		1,513,532.48		
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)		887,488.27		
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES					
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			For further information, contact:		
TYPE OR PRINT NAME OF TREASURER ASSISTANT TREASURER MARY PARKER LEWIS			Federal Election Commission Toll Free 800-424-9530 Local 376-3120		
SIGNATURE OF TREASURER ASSISTANT TREASURER <i>Mary Parker Lewis</i>		DATE 6-20-96			
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.					
All previous versions of FEC Form 3P are obsolete and should no longer be used.					
FEC FORM 3P (2/83)					

9986004330859734617592

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE (in Full)		REPORT COVERING THE PERIOD:	
<u>ALAN KEYES FOR PRESIDENT '96, INC.</u>		From: <u>5/1/96</u> Through: <u>5/31/96</u>	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS			
16. FEDERAL FUNDS (Itemize on Schedule A-P)		<u>60,532.71</u>	<u>308,889.93</u>
17. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees		<u>229,759.61</u>	<u>1,513,992.48</u>
(b) Political Party Committees			
(c) Other Political Committees			
(d) The Candidate			
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)).		<u>229,759.61</u>	<u>1,513,992.48</u>
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.		<u>1,779.25</u>	<u>2,773.01</u>
19. LOANS RECEIVED:			
(a) Loans Received From or Guaranteed by Candidates.			
(b) Other Loans			
(c) TOTAL LOANS (Add 19(a) and 19(b)).			
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):			
(a) Operating		<u>360.36</u>	<u>360.36</u>
(b) Fundraising			
(c) Legal and Accounting			
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)).		<u>360.36</u>	<u>360.36</u>
21. OTHER RECEIPTS (Dividends, Interest, etc.)			
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21).		<u>292,431.93</u>	<u>1,826,015.78</u>
II. DISBURSEMENTS			
23. OPERATING EXPENDITURES		<u>107,436.37</u>	<u>887,848.63</u>
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		<u>3,132.07</u>	<u>74,185.31</u>
25. FUNDRAISING DISBURSEMENTS.		<u>120,106.03</u>	<u>776,628.72</u>
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS			
27. LOAN REPAYMENTS MADE:			
(a) Repayments of Loans Made or Guaranteed by Candidates			
(b) Other Repayments			
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)).			
28. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		<u>410.00</u>	<u>460.00</u>
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))		<u>410.00</u>	<u>460.00</u>
29. OTHER DISBURSEMENTS.			
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)		<u>231,084.47</u>	<u>1,739,122.66</u>
III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)			
31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)		<u>NONE</u>	<u>NONE</u>

96030574153

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
K & K Insurance 1712 Magnavox Way PO Box 2338 Fort Wayne IN 46801-2338	insurance (adjusted) ³	1069.50	-1069.50	0.00	0.00
Nature of debt:					
KAIM Radio 3555 Harding Ave Honolulu HI 96816	spots	393.76	0.00	0.00	393.76
Nature of debt:					
Kam Autoproducts Inc. PO Box 1005 Green Bay WI 54307	printing	1018.24	0.00	0.00	1018.24
Nature of debt:					
Kris Logeman W290 N8308 Florence, WI 53029	event rental	331.50	0.00	0.00	331.50
Nature of debt:					
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630	professional services	33000.00	0.00	0.00	33000.00
Nature of debt:					
Larry McClaine 4169 Botanical St Louis MO	phones	2578.55	0.00	1275.63	1302.92
Nature of debt:					
Larsen's Printing 1300 Pierce St Sioux City IA 51105	printing	784.00	0.00	784.00	0.00
Nature of debt:					
Liberty Marketing 523 E 9th St Schuyler NE 68661	marketing consultant	6000.00	0.00	0.00	6000.00
Nature of debt:					

9966004330859734618615



SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
UPS PO Box 85036 Louisville KY 40258 Nature of debt:	delivery service	3506.52	2281.43	5787.95	0.00
UPS 3840998977 1506 Joh Ave Baltimore MD 21227 Nature of debt:	delivery & postage	3481.47	0.00	1781.47	1700.00
US West 5034631818 PO Box 5508 Bismarck ND 58502 Nature of debt:	telephone	186.22	0.00	0.00	186.22
US West 6127771987 Minneapolis MN Nature of debt:	telephone	4205.69	0.00	4205.69	0.00
Washington Intelligence Bureau 2727 Merrilee Dr Fairfax VA 22031 Nature of debt:	data processing	6134.10	1936.53	2639.16	5431.47
WEMI 1909 W 2nd Street Appleton WI 54914 Nature of debt:	delivery	46.50	0.00	0.00	46.50
William Perry 940 Gray Eagle Cir N Colorado Springs CO 80919 Nature of debt:	printing - travel - event rental	3675.90	0.00	0.00	3675.90
Wooten Graphics 501 9th St Exit Lexington NC 27292 Nature of debt:	shipping fees	138.29	0.00	0.00	138.29
		1090824.44	222318.51	175708.89	1112796.13

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7
ORIGINAL
page

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
K & K Insurance 1712 Magnavox Way PO Box 2338 Fort Wayne IN 46801-2338 Nature of debt:	insurance (adjusted) ³	1069.50	-1069.50	0.00	0.00
KAIM Radio 3555 Harding Ave Honolulu HI 96816 Nature of debt:	spots	393.76	0.00	0.00	393.76
Kam Autoproducts Inc. PO Box 1005 Green Bay WI 54307 Nature of debt:	printing	1018.24	0.00	0.00	1018.24
Kris Logeman W290 N8308 Florence, OH Hardland WI 53029 Nature of debt:	event rental	331.50	0.00	0.00	331.50
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630 Nature of debt:	professional services	33000.00	0.00	0.00	33000.00
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630 Nature of debt:	professional services	0.00	78100.00	0.00	78100.00
Larry McClaine 4169 Botanical St Louis MO Nature of debt:	phones	2578.55	0.00	1275.63	1302.92
Larsen's Printing 1300 Pierce St Sioux City IA 51105 Nature of debt:	printing	784.00	0.00	784.00	0.00
Liberty Marketing 523 E 9th St Schuyler NE 68661 Nature of debt:	marketing consultant	6000.00	0.00	0.00	6000.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Deborah Demien 1515 Wilmer Rd Wentzville MO 63385			05 31 96	05 08 96	
Nature of debt:	event travel & postage	1619.04	0.00	1619.04	0.00
Dixie Patterson 6123 N 28 St Phoenix AZ 85016			05 31 96	05 16 96	
Nature of debt:	clerical salary	4000.00	0.00	1000.00	3000.00
Eberle & Assoc. 1420 Spring Hill Road McLean VA 22102			05 31 96	05 28 96	
Nature of debt:	mailing costs	8439.21	684.62	894.50	8229.33
Eberle Data Center 1420 Spring Hill Road McLean VA 22102			05 31 96	05 20 96	
Nature of debt:	data processing	11610.07	1870.09	3688.37	9791.79
Edmund Peterson c/o 300 Eye Street NE Suite 3 Washington DC 20002			05 31 96		
Nature of debt:	professional services	0.00	92500.00	0.00	92500.00
Fedex PO Box 1140 Memphis TN 38101			05 31 96		
Nature of debt:	delivery	5556.45	0.00	0.00	5556.45
FedEx General American Credits PO Box 7431 Dublin OH 43017			05 31 96	05 16 96	
Nature of debt:	delivery service	1204.07	0.63	1204.70	0.00
FMG Inc 3748 S Elm Place Broken Arrow OK 74011			05 31 96		
Nature of debt:	answering service (adjusted) ²	1831.10	-1831.10	0.00	0.00
Frenchman's Reef GPO Box 7431 Dublin OH 43017			05 31 96		
Nature of debt:	travel	562.51	0.00	0.00	562.51

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Roger Schoers c/o 1666 White Bear Ave Suite 150 St Paul MN 55106 Nature of debt:	audio tapes	50.00	0.00	0.00	50.00
Ronald Reagan Library 40 Presidential Drive Simi Valley CA 93065 Nature of debt:	books	98.53	0.00	98.53	0.00
Saber Communications Inc 108 Stonehouse Road Fredericksburg Va 22406 Nature of debt:	data base	225.84	0.00	0.00	225.84
Sarah Oldham 6905 Washington Ave St Louis MO 63130 Nature of debt:	audio tapes	1779.32	0.00	1779.32	0.00
Sarah Smith 11618 Taneytown Pike Emmitsburg MD 21727 Nature of debt:	professional services	10.00	10500.00	0.00	10500.00
Southwest Policy Group 2907 N Second St Phoenix AZ 85012 Nature of debt:	phones - office - travel - polling	13346.06	0.00	1233.06	12113.00
Southwest Policy Group 2907 N Second St Phoenix AZ 85012 Nature of debt:	campaign consulting services	80000.00	0.00	0.00	80000.00
St Charles Insurance 214 Compass Point Dr St Charles MO 63301 Nature of debt:	event insurance	306.25	0.00	306.25	0.00
St Joseph Comm Inc PO Box 720 West Covina CA 0 Nature of debt:	audio tapes	1368.00	0.00	0.00	1368.00

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
UPS PO Box 85036 Louisville KY 40258 Nature of debt:	delivery service	3506.52	2281.43	5787.95	0.00
UPS 3840998977 1506 Joh Ave Baltimore MD 21227 Nature of debt:	delivery & postage	3481.47	0.00	1781.47	1700.00
US West 5034631818 PO Box 5508 Bismarck ND 58502 Nature of debt:	telephone	186.22	0.00	0.00	186.22
US West 6127771987 Minneapolis MN Nature of debt:	telephone	4205.69	0.00	4205.69	0.00
Washington Intelligence Bureau 2727 Merrilee Dr Fairfax VA 22031 Nature of debt:	data processing	6134.10	1936.53	2639.16	5431.47
WEMI 1909 W 2nd Street Appleton WI 54914 Nature of debt:	delivery	46.50	0.00	0.00	46.50
William Perry 940 Gray Eagle Cir N Colorado Springs CO 80919 Nature of debt:	printing - travel - event rental	3675.90	0.00	0.00	3675.90
Wooten Graphics 501 9th St Exit Lexington NC 27292 Nature of debt:	shipping fees	138.29	0.00	0.00	138.29
		1090824.44	300448.81	175708.89	1215564.36

93043893686

REPORT RECEIPTS AND DISBURSEMENTS
BY AN AUTHORIZED COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENTRECEIVED
FEDERAL ELECTION
COMMISSION
PUBLIC DISCLOSURE
DIVISION

7

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE FEC MAILING LABEL OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) ALAN KEYES FOR PRESIDENT '96, INC		2. IDENTIFICATION NUMBER C 00303214		
	ADDRESS (number and street) ☐ Check if different than previously reported 2515 WHITE BEAR AVENUE		3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR:		
	CITY, STATE and ZIP CODE ST PAUL, MINNESOTA 55109		☒ Primary ☐ General		
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	☐ Amendment for (Report)		☒ Monthly Report (month) JUNE 1996		
	☐ April 15 Quarterly Report		☐ January 31 Year-end Report		
	☐ July 15 Quarterly Report		☐ Termination Report		
	☐ October 15 Quarterly Report		☐ Twelfth Day Before Election		
		☐ Thirtieth Day After Election		TYPE OF ELECTION PRIMARY	
		STATE NATION		ELECTION DATE 8/12/96	

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD		FROM JUNE 1, 1996	THROUGH JUNE 30, 1996
SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD		136,014.79
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)		301,930.37
	8. SUBTOTAL (Add Line 6 and 7)		437,945.16
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)		341,619.94
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)		96,325.22
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)		57,529.31
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)		820,431.14
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)		1,452,904.53
	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17e Column B)		1,631,800.64
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)		1,096,903.79
	NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES		

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

TYPE OR PRINT NAME OF TREASURER ASSISTANT TREASURER

MARY PARKER LOWIS

SIGNATURE OF TREASURER ASSISTANT TREASURER

DATE

7-20-96

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 376-3120

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

All previous versions of FEC Form 3P are obsolete and should no longer be used.

FEC FORM 3P (2/83)

DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE (in Full)

ALAN KEYES FOR PRESIDENT '96, INC

REPORT COVERING THE PERIOD:

From: 6/1/96 Through: 6/30/96COLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date**I. RECEIPTS**

16. FEDERAL FUNDS (Itemize on Schedule A-P)

174,396.96

483,286.89

16

17. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

127,018.16

1,441,010.64

17(a)

(b) Political Party Committees

- 0 -

- 0 -

17(b)

(c) Other Political Committees

- 0 -

- 0 -

17(c)

(d) The Candidate

- 0 -

- 0 -

17(d)

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)).

127,018.16

1,441,010.64

17(e)

18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

2,773.01

18

19. LOANS RECEIVED:

(a) Loans Received From or Guaranteed by Candidate

- 0 -

- 0 -

19(a)

(b) Other Loans

- 0 -

- 0 -

19(b)

(c) TOTAL LOANS (Add 19(a) and 19(b))

- 0 -

- 0 -

19(c)

20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):

(a) Operating

515.25

875.61

20(a)

(b) Fundraising

- 0 -

- 0 -

20(b)

(c) Legal and Accounting

- 0 -

- 0 -

20(c)

(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)).

515.25

875.61

20(d)

21. OTHER RECEIPTS (Dividends, Interest, etc.)

21

22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21).

301,930.37

2,127,946.15

22

II. DISBURSEMENTS

23. OPERATING EXPENDITURES

209,930.77

1,097,779.40

23

24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

- 0 -

74,185.31

24

25. FUNDRAISING DISBURSEMENTS

122,939.17

899,567.89

25

26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS

- 0 -

- 0 -

26

27. LOAN REPAYMENTS MADE:

(a) Repayments of Loans Made or Guaranteed by Candidate

- 0 -

- 0 -

27(a)

(b) Other Repayments

- 0 -

- 0 -

27(b)

(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)).

- 0 -

- 0 -

27(c)

28. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

8,750.00

9,210.00

28(a)

(b) Political Party Committees

- 0 -

- 0 -

28(b)

(c) Other Political Committees

- 0 -

- 0 -

28(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))

8,750.00

9,210.00

28(d)

29. OTHER DISBURSEMENTS

- 0 -

- 0 -

29

30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)

341,619.94

2,080,742.60

30

III. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)

None

None

31

PRINT FOR USER: *

Filer Id : C00303214
Amendment Ind. : N
Report Type : M7
Election Cycle : 1996
Creation Date : 960721
Image Start : 96030685043
Image End : 96030685092
Number of Pages : 50

98043893689

REPORT OF RECEIPTS AND DISBURSEMENT
BY AUTHORITY OF THE COMMITTEE OF A
CANDIDATE FOR THE OFFICE OF PRESIDENT

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

AUG 20 9 32 AM '54

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.

USE FEC MAILING LABEL OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) ALAN KEYES FOR PRESIDENT '96, INC		2. IDENTIFICATION NUMBER C-00303214	
	ADDRESS (number and street) ☐ Check if different than previously reported 2515 WHITE BEAR AVENUE SUITE 8A-301		3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR: ☒ Primary ☐ General	
	CITY, STATE and ZIP CODE ST PAUL, MINNESOTA 55109			
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	☐ Amendment for (Report) _____		☒ Monthly Report (month) JULY 1996	
	☐ April 15 Quarterly Report		☐ January 31 Year-end Report	
	☐ July 15 Quarterly Report		☐ Termination Report	
	☐ October 15 Quarterly Report		☐ Twelfth Day Before Election	
	☐ April 15 Quarterly Report		☐ Thirtieth Day After Election	
	☐ July 15 Quarterly Report		TYPE OF ELECTION PRESIDENT OF U.S.A.	
	☐ October 15 Quarterly Report		STATE NATION	
	3RN-M8		ELECTION DATE 11/5/96	

5. COVERING PERIOD

FROM
JULY 1, 1996

THROUGH July 31, 1996

SUMMARY

- | | |
|--|--------------|
| 6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD | 96,325.22 |
| 7. TOTAL RECEIPTS THIS PERIOD
(From Line 22 Column A) | 222,866.87 |
| 8. SUBTOTAL
(Add Line 6 and 7) | 319,192.10 |
| 9. TOTAL DISBURSEMENTS THIS PERIOD
(From Line 30 Column A) | 226,893.18 |
| 10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD
(Subtract Line 9 from 8) | 92,298.92 |
| 11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE
(Itemize All on Schedule C or Schedule D) | 59,529.31 |
| 12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE
(Itemize All on Schedule C or Schedule D) | 607,436.45 |
| 13. EXPENDITURES SUBJECT TO LIMITATION
(From FEC Form 3P, Page 4) | 1,610,337.23 |
| 14. NET CONTRIBUTIONS (Other than Loans)
(Subtract Line 28d Column B from 17e Column B) | 1,719,526.96 |
| 15. NET OPERATING EXPENDITURES
(Subtract Line 20a Column B from 23 Column B) | 1,254,336.49 |

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

TYPE OR PRINT NAME OF TREASURER ASSISTANT TREASURER

MAX PARKER LOWIS

SIGNATURE OF TREASURER ASSISTANT TREASURER

DATE _____

**For further information,
contact:**

Federal Election Commission
Toll Free 800-424-9530
Local 376-3120

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

All previous versions of FEC Form 3P are obsolete and should no longer be used.

FEC FORM 3P (2/83)

(5)	7/21	RAD 2/21	RAD 5/23	/	.	-		
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DETAILED SUMMARY OF RECEIPTS AND DISBURSEMENTS
(Page 2, FEC FORM 3P)

NAME OF COMMITTEE (in Full)

ALAN KEYES FOR PRESIDENT '96, INC.

REPORT COVERING THE PERIOD:

From: July 1, 1996 Through: July 31, 1996

I. RECEIPTSCOLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date

16. FEDERAL FUNDS (Itemize on Schedule A-P)

128,665.30

611,952.19

16

17. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

92,751.32

1,733,761.96

17(a)

(b) Political Party Committees

17(b)

(c) Other Political Committees

17(c)

(d) The Candidate

17(d)

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)).

92,751.32

1,733,761.96

17(e)

18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

55.58

2,828.59

18

19. LOANS RECEIVED:

(a) Loans Received From or Guaranteed by Candidates

19(a)

(b) Other Loans

19(b)

(c) TOTAL LOANS (Add 19(a) and 19(b))

19(c)

20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):

(a) Operating

1,394.68

2,270.29

20(a)

(b) Fundraising

20(b)

(c) Legal and Accounting

20(c)

(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)).

1,394.68

2,270.29

20(d)

21. OTHER RECEIPTS (Dividends, Interest, etc.)

21

22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21).

222,866.88

2,350,813.03

22

II. DISBURSEMENTS

23. OPERATING EXPENDITURES

158,827.38

1,256,606.78

23

24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.

74,185.31

24

25. FUNDRAISING DISBURSEMENTS.

56,040.80

955,608.69

25

26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS

26

27. LOAN REPAYMENTS MADE:

(a) Repayments of Loans Made or Guaranteed by Candidate

27(a)

(b) Other Repayments

27(b)

(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)).

27(c)

28. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

5,025.00

14,235.00

28(a)

(b) Political Party Committees

28(b)

(c) Other Political Committees

28(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c))

5,025.00

14,235.00

28(d)

29. OTHER DISBURSEMENTS.

7,000.00

7,000.00

29

30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29)

226,893.18

2,307,635.78

30

31. CONTRIBUTED ITEMS (Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List)

NONE

NONE

31

PRINT FOR USER: *

Filer Id : C00303214
Amendment Ind. : N
Report Type : M8
Election Cycle : 1996
Creation Date : 960826
Image Start : 96030754030
Image End : 96030754067
Number of Pages : 38

9604338933692



FEDERAL ELECTION COMMISSION

Washington, DC 20463

December 3, 1996

Kristin R. Kazyak
128 W. Main Street
Front Royal, VA 22630

RE: MUR 4587

Dear Ms. Kazyak:

This letter acknowledges receipt on November 25, 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 4587. 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,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure
Procedures

980433693



FEDERAL ELECTION COMMISSION
Washington, DC 20463

December 3, 1996

Mary Parker Lewis, Treasurer
Alan Keyes for President '96 Committee
2515 White Bear Avenue
Suite 8A-301
St. Paul, MN 51109-5159

RE: MUR 4587

Dear Ms. Lewis:

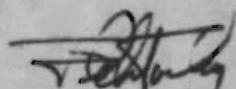
The Federal Election Commission received a complaint which indicates that Alan Keyes for President '96 Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4587. 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.

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

980438933695



FEDERAL ELECTION COMMISSION
Washington, DC 20463

December 3, 1996

David G. Racer, Jr.
1535 Barclay Street
St. Paul, MN 55106

RE: MUR 4587

Dear Mr. Racer:

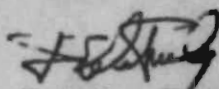
The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4587. Please refer to this number in all future correspondence.

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.

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

Sincerely,



F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

980438936697

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

DEC 20 1 08 PM '96

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-8800

FACSIMILE (202) 457-0102

December 20, 1996

VIA FACSIMILE
202-219-3923

F. Andrew Turley, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4587

Respondents: Alan Keyes for President '96, Inc.
c/o David G. Racer, Jr.

Dear Mr. Turley:

Pursuant to Fed. R. Civ. P. 6(b) and for good cause shown, respondents request an enlargement of time to respond to the Complaint filed by Kristin Kazyak, dated November 11, 1996. An enlargement is requested to January 27, 1997.

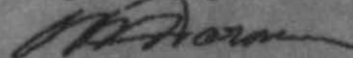
The Complaint states allegations against Alan Keyes for President, '96, Inc., Mary Parker Lewis and David Racer which are without merit. A vigorous defense is appropriate here.

Because of the Christmas holidays, the work days available to address this Complaint are limited. Undersigned counsel is in deposition in federal court litigation for each day from December 30 through January 15, 1997, and out-of-state litigation in the third week in January. Mr. Racer and Mrs. Lewis are both out of town through the first of the year.

Because I am the committee's general counsel, I will be solely responsible for answering the Complaint and litigating the claims of Ms. Kazyak on behalf of all respondents.

Please advise me.

Very truly yours,


C. Michael Tarone

CMT: id
cc: David G. Racer, Jr.
Mary Parker Lewis

9 8 0 4 3 8 9 3 6 9 8



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1996

C. Michael Tarone, Esq.
1815 H Street, NW
Washington, DC 20006

re: MUR 4587

Dear Mr. Tarone:

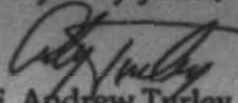
It was a pleasure speaking with you today relative to the above-captioned Matter Under Review (MUR). Thank you for your letter confirming your request for an enlargement of time in which to respond.

Your request is approved, based upon the good cause shown in your letter. Your response will be due no later than the close of business on Monday, January 27, 1997.

Please ensure that each respondent whom you will represent in this matter files a completed Designation of Counsel form as soon as possible. As you may be aware, the Commission's proceedings in the pre-investigative and investigative stages are both sensitive and confidential. Designations of Counsel executed by each respondent greatly help us to preserve the confidential nature of these proceedings and enable us to freely discuss your clients' case with you.

Many thanks for your consideration. If we can be of any further assistance, please contact Mr. Erik Morrison of my staff at (202) 219-3690.

Very truly yours,


F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

980433992

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-6880

FACSIMILE (202) 429-0102

December 31, 1996

VIA FACSIMILE
202-219-3923

F. Andrew Turley, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

JAN 2 9 30 AM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: MUR 4587

Respondents: Alan Keyes for President '96, Inc.
c/o David G. Racer, Jr.

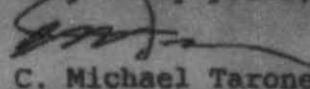
Dear Mr. Turley:

This letter follows my letter to you of December 20, 1996 transmitted by facsimile wherein respondents pursuant to Fed. R. Civ. P. 6(b) and for good cause shown, requested an enlargement of time to respond to the Complaint filed by Kristin Kazyak, dated November 11, 1996. The enlargement requested was to January 27, 1997.

Because I do not have a formal reply, this letter is to request the status of the application for more time which we discussed by telephone on December 20, 1996.

Thank you for your cooperation in this matter.

Very truly yours,



C. Michael Tarone

CMT: id
cc: David G. Racer, Jr.
Mary Parker Lewis

98043893700



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 3, 1997

C. Michael Tarone, Esq.
1815 H Street, NW
Washington, DC 20006

re: MUR 4587

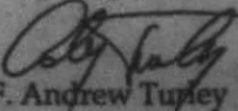
Dear Mr. Tarone:

Thank you for your letter regarding our discussion on December 20, 1996 concerning your request for an enlargement of time in which to respond to the above-captioned MUR.

I was concerned to receive your letter yesterday, since I drafted and sent a letter to you right after our telephone conversation. My file copy is attached. Though I prepared my letter right away, it apparently did not leave our office until December 23d. Please accept my apologies that this letter did not reach you in a more timely fashion.

Many thanks for your consideration. If we can be of any further assistance, please contact me or Mr. Erik Morrison of my staff at (202) 219-3690.

Very truly yours,


F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

98043893701

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

*1815 H Street, N.W.
Washington, D.C. 20006*

12021 487-8680

FACSIMILE (202) 489-0103

January 27, 1997

VIA FACSIMILE
202-219-3923F. Andrew Turley, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4587

Respondents: Alan Keyes for President '96, Inc.
c/o David G. Racer, Jr.

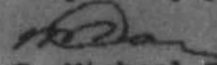
Dear Mr. Turley:

This letter is to request an enlargement of time of seven (7) additional days pursuant to Fed. R. Civ. P. 6(b) and for good cause shown, for filing a response to the allegations of Ms. Kazyak in the above styled action. The due date would be February 3, 1997.

Additional time is needed in order to prepare affidavits and a formal response. It is also necessitated by the congestion of counsel's trial calendar.

Thank you for your cooperation in this matter.

Very truly yours,


C. Michael Tarone

CMT: id

JAN 27 10 19 AM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

98043893702

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-6680

FACSIMILE (202) 429-0102

January 31, 1997

VIA FACSIMILE -- (202) 219-3923

F. Andrew Turley, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463Re: MUR-4587

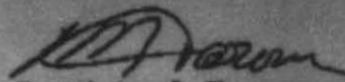
Dear Mr. Turley:

I am writing with respect to the above-referenced matter. Someone from my office tried earlier today to speak with Erik Morrison, but was only able to reach his voice mail.

I would like to ask for your courtesy in allowing us a few more days within which to respond to the allegations in the complaint filed with your office. Due to a court filing in another matter earlier this week and related negotiations in that matter, I have not been able to devote as much time as I had anticipated to the matter before your office. Please be assured that we take very seriously the allegations raised in the complaint and, in order to address them properly, we appreciate a brief extension of time - until Thursday, February 6, 1997 - to respond to the complaint.

I appreciate your cooperation in this matter. If you have any questions, please call me at (202) 457-6680.

Very truly yours,


C. Michael Tarone

JAN 31 5 01 PM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

93043893703

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-6680

FACSIMILE (202) 429-0101

February 6, 1997

VIA FACSIMILE -- (202) 219-3923

F. Andrew Turley, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463Re: MUR-4587

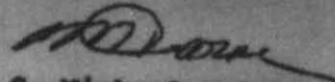
Dear Mr. Turley:

I am writing with respect to the above-referenced docket number. We are in the process of preparing a response for filing later today and would like to inform you procedurally how we may ultimately make the filing.

I understand that the Federal Election Commission's offices close at 5:30 p.m. and that some guards in the lobby do not accept papers for filing after-hours. While I shall make a best effort to make the filing before 5:30 p.m., I understand that, in the event that I cannot make the filing until after-hours, the FEC will accept a fax filing at the facsimile number listed above and will accept delivery of a hard copy of the filing tomorrow.

If you have any questions or if my understanding of the filing procedures is incorrect, please call me at (202) 457-6680. If I do not hear from you, I shall assume that this procedure is acceptable to you. Thank you for your numerous courtesies in this matter. With best regards.

Very truly yours,


C. Michael Tarone

FEB 6 11 13 AM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

98043893704

BEFORE THE
FEDERAL ELECTION COMMISSION

Kristin R. Kazyak
128 West Main Street
Front Royal, Virginia 22630,

Complainant,

v.

Alan Keyes for President '96, Inc.
c/o David Racer
2515 White Bear Avenue
Suite 8A-301
St. Paul, Minnesota 55109,

Respondent.

MUR-4587

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
FEB 7 4 28 PM '97

RESPONSE OF ALAN KEYES FOR PRESIDENT '96, INC.
TO COMPLAINT OF KRISTIN R. KAZYAK
(As Amended)

Alan Keyes for President '96, Inc. ("AKP" or the
"Committee") hereby submits this response to the Complaint filed
by Kristin R. Kazyak pursuant to section 309 of the Federal
Election Campaign Act of 1971, as amended ("Act"), 2 U.S.C. §
427g(a)(1). The Committee respectfully requests that based on
the record herein the Complaint be dismissed and no action be
taken.

Kristin R. Kazyak is a former campaign functionary who
asserts in the Complaint that David G. Racer, the National
Campaign Manager, authorized filing the monthly Federal Election
Commission ("FEC") reports only after "whiting out... of
invoicing for professional fees of Kristin R. Kazyak, employed by
the Committee and a member of the senior staff from August 1,

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1995 thru [sic] July 31, 1996"; (2) "the Committee's failure to report or compensate these professional services and the involved fees led directly to [Ms. Kazyak's] filing for bankruptcy in July 25, 1996; and (3) that the alleged failure to report or compensate for the professional services "constitute[s] as well, an unpaid, unreported individual loan, or 'contribution,' to the Committee of over \$120,000, well in excess of the individual limit of \$1,000."

In Part I respondent sets forth the factual background and in Part II addresses the allegations of the Complaint. Attached hereto are exhibits and an index. Two of the exhibits are affidavits in support of the Committee's response, that of David G. Racer, the National Campaign Manager (**Exhibit 1**) and that of Mary Parker Lewis, the Chief of Staff (**Exhibit 2**).

FACTUAL BACKGROUND

1. "[Ms.] Kazyak initially served as a volunteer for the Keyes campaign, and later served as a private contractor for secretarial services to the Committee. During that entire period of time, from July 1, 1995 through July 31, 1996, Ms. Kazyak worked under the direct supervision [of Mary Parker Lewis, Chief of Staff]." (**Exhibit 2**, Lewis Aff. ¶ 2 at 1).

2. "When Ms. Kazyak first started working as a volunteer for the Committee, she told [Ms. Lewis, to whom she directly reported] that she had a significant amount of outstanding personal debt. [Ms. Lewis] advised Ms. Kazyak numerous times of

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the financial limitations of a committee such as [AKP]. [Ms. Lewis] informed her that should she be hired for services, it could only be as a contractor for secretarial and support staff services, not for computer or systems analysis work. [Ms. Lewis] informed her that such secretarial work would command only the same rate as her predecessor was paid in the position. The position was primarily data entry and low-level clerical tasks, for which the Committee would pay only \$2,000 per month, paid intermittently as cash flow allowed. [Ms. Lewis] advised Ms. Kazyak that in her circumstances, she should seek more lucrative source of income elsewhere. Ms. Kazyak, however, professed herself committed to Ambassador Alan Keyes' candidacy for the Presidency, and when it came open, she solicited the secretarial position, and accepted the \$2,000 rate." (Id. ¶ 3 at 2).

3. "At the time Ms. Kazyak started working for AKP, she was unemployed, and had been for many months. Although Ms. Kazyak had apparently been interviewing in the private sector, [Ms. Lewis] understand that she did not have any job offers when she started working for AKP. Throughout her association with AKP, [Ms. Lewis] encouraged her to try to secure a source of income elsewhere with better remuneration, going so far as to facilitate some interviews and supplemental contract work for her. (Id. ¶ 4, at 2-3).

4. "[It was understood by Ms. Lewis that] Ms. Kazyak had no political campaign employment experience whatever, and very little volunteer experience. She had no familiarity with

9 8 0 4 3 8 9 3 7 0 8
campaign or accounting software, nor, to [Ms. Lewis'] knowledge, any accounting training or background. At [Ms. Kazyak's] insistence, she ultimately performed all her data entry and secretarial tasks in a single word processing program, Word Perfect 3.1. Because she refused to learn any standard accounting program, even though [Ms. Lewis'] consulting firm and the campaign purchased several for her use, [Ms. Lewis] finally allowed her to set up her own graphs and charts for data entry purposes. At no time whatever did she design, engineer, manipulate or manage the campaign's master data base [as she has alleged]. It is [Ms. Lewis'] understanding that [Ms. Kazyak] never had direct access to it, nor the technical competence to operate within it. [Ms. Kazyak] was not authorized to do so. [Ms. Kazyak] did, on a very few occasions, provide limited data entry, which may have been transferred directly into it via disc or electronic transfer." (Id. ¶ 5 at 3).

5. "Ms. Kazyak's job at AKP consisted primarily of clerical and receptionist tasks in the Alexandria office, for which she seemed suited in light of her secretarial and data processing experience. Ms. Kazyak did not perform any highly specialized technical processes or functions for the Committee, as she claims. She photocopied, she data-entered, she answered the phone, she opened mail. Her position was that of an office assistant [working under Ms. Lewis]. She occasionally requested, and was in a very few instances accommodated, in being allowed to staff the candidate at appearances in the Washington metro area.

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so she could video or audio tape his remarks. She was not hired to tape or transcribe his campaign or personal appearances, nor was she promised remuneration for doing so. The Committee had several volunteers around the country providing such services, and making transcripts available to the volunteers' internet site. [Ms. Lewis] sharply dispute[s] paragraph 9 of the Memo to the Trustee [Exhibit 10], at 2-3, which is attached to the complaint." (Id. ¶ 6, at 3-4).

6. "All of the references in Ms. Kazyak's complaint regarding her automated or computer systems duties are either false or exaggerated.... On two or three occasions, she assisted another campaign functionary at a different office location with quite routine software or accessory upgrades. [AKP's] office contained one 486 PC, of which Ms. Kazyak had virtually sole use." (Id. ¶ 7 at 4).

7. "Ms. Kazyak agreed to work for AKP at the rate of \$2,000 per month. Ms. Kazyak worked directly under [Ms. Lewis'] supervision as an office assistant. [Ms. Lewis] oversaw, among other things, her in-put of financial data for [FEC] reporting purposes, mostly involving accounts payable and the itemization of debt. Ms. Kazyak was not delegated by [Ms. Lewis] or any other official of AKP to authorize debt claims, nor to exercise any other discretionary judgment regarding AKP's liabilities, obligations, or operations. Moreover, Ms. Kazyak was never designated 'senior staff;' she was not privy to consultations or decision-making within the high levels of the campaign; the title

she used among volunteers and the internet community as "new media contact" and other such designations were self-styled, unsolicited, but in the view of the Committee's press secretary and other senior staff both meaningless and harmless, and hence tolerated. Finally, no proposals or initiatives for automated or computerized systems or functions were desired or solicited from Ms. Kazyak by the Committee." (Id. ¶ 8 at 5).

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8. "In contravention of her assigned duties and without any authority to do so, Ms. Kazyak entered on draft FEC reports amounts of money she - and only she - believed AKP owed her. Ms. Kazyak and [Ms. Lewis], together with David Racer, National Campaign Manager for AKP, discussed Ms. Kazyak's improper entries of data on draft reports. During these discussions, Ms. Kazyak acknowledged that no officer of AKP had agreed to or authorized the amounts she arbitrarily had entered. [Ms. Kazyak] merely asserted that it was a matter of 'justice,' that she was entitled to such amounts, and that she believed they represented 'a professional hourly rate' for her services. Ms. Kazyak subsequently withdrew her claim for compensation at such an exaggerated rate, and at the direction of the campaign manager, David Racer, Ms. Kazyak herself re-entered on the FEC draft reports a revised compensation rate. This rate, of \$3,300 per month, was proposed by Ms. Kazyak herself, and generously accepted by the campaign manager, David Racer, over [Ms. Lewis'] objections, but with [Ms. Lewis'] final concurrence." (Id. ¶ 9 at 5-6).

9. "In the course of the primary election effort, AKP relied chiefly on unpaid volunteers. There were very few paid positions. [The Committee] operated out of two principal campaign locations: Alexandria, Virginia; and St. Paul, Minnesota." (Exhibit 1, Racer Aff. ¶ 3 at 1).

10. "In February 1996, [Mr. Racer recalls having] a telephone conversation with Ms. Kazyak in which [they] discussed her compensation. In that conversation, [Ms. Kazyak] expressed to [him] her belief that the Committee had agreed to pay her at a rate high enough to pay the debt service on her credit card debt. [Ms. Kazyak] suggested to [him] that her monthly credit card debt service cost was \$3,300, or \$ 39,300 annually. While this amount was far greater than the \$2,000 monthly amount the Committee's Chief of Staff Mary Parker Lewis had suggested to pay Ms. Kazyak, [Mr. Racer] felt the \$3,300 was fair and reasonable and that the Committee could afford it. Exercising [his] authority as the National Campaign Manager, [Mr. Racer] entered into an agreement with Ms. Kazyak to pay her at the rate of \$3,300 per month retroactive to her start date with the Committee, July 1995. There is no doubt in [Mr. Racer's] mind that in this telephone conversation Ms. Kazyak and [Mr. Racer] agreed to \$3,300 per month as just compensation." (Id. ¶ 4 at 1-2).

11. "Under federal law, the Committee was obligated to file monthly disclosure statements with the FEC during the course of the 1996 election year. In the February 1996 disclosure

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statement filed with the FEC [Exhibit 3], the Committee disclosed its indebtedness to Ms. Kazyak in the amount of \$26,400, which was based on service over a period of eight (8) months at \$3,300 per month. This disclosure is reflected on page 5 of Schedule D-P for the period ending February 29, 1996. [Exhibit 3]. This disclosure is consistent with [Mr. Racer's] previous conversation with Ms. Kazyak." (Id. ¶ 5 at 2).

12. "In April 1996, Mary Parker Lewis telephoned [Mr. Racer] regarding an entry she discovered in the March 31, 1996 disclosure statement. She advised [him in that conversation] that Ms. Kazyak had apparently unilaterally inserted in the Committee's Schedule D-P filing (Exhibit 5) an amount [claimed to be] owed to her which was several times greater than the agreed upon \$3,300 per month compensation. [Mr. Racer's] best memory is that the amount Ms. Kazyak inserted was \$10,400 a month. [He] was shocked. [He] concurred in the concern Ms. Lewis expressed because Ms. Kazyak had enjoyed the trust of the Committee and had access to its books and records. [Ms. Kazyak] in fact assisted in the preparation of the disclosure statements filed with the FEC." (Id. ¶ 6 at 2-3).

13. "Confronted with a circumstance where a campaign functionary unilaterally increased her agreed upon compensation rate by more than 200% very late in the day on the eve of an FEC filing deadline, [Mr. Racer] directed, after consultation with staff, that the false entry be removed, and that the correct amount, \$3,300, be inserted in order to comply with the

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Committee's understood obligation to file accurate reports. In [Mr. Racer's] opinion, a disclosure form reflecting Ms. Kazyak's altered amount would have been inaccurate, false and misleading and possibly a violation of law. [Mr. Racer] believed...that [he] had a legal duty to prevent the altered and false amount from being included in the Committee's filing." (Id. ¶ 7 at 3).

14. "[Mr. Racer was of the opinion that he] was confronted with an unauthorized act by a functionary which raised immediate concern as to her judgment and honesty. In light of the practices of this Committee to be fair and understanding towards those working for the campaign, [Mr. Racer] did not terminate Ms. Kazyak although this alone was ground for doing so. However, [Mr. Racer] did discuss this issue with her and I told her to remove the altered amount and insert the correct amount. She did so. The agreed upon \$3,300 monthly amount was inserted...." (Id. ¶ 8 at 3-4).

15. "[Mr. Racer was being] paid at the monthly rate of \$5,000. The Chief of Staff has been paid at the rate of \$7,000 per month." (Id. ¶ 9 at 4). Ms. Kazyak nonetheless claims she is due more than \$10,000 per month for her office support services.

16. "[T]he office manager for the Committee at its St. Paul headquarters who has essentially the same duties as Ms. Kazyak was paid at the rate of \$400 per week or \$1,650 per month until the past week when her compensation was raised to \$450 per week." (Id. ¶ 10 at 4).

17. "On or about June 19, 1996, [Mr. Racer] received a facsimile copy of Schedule D-P for the period ending May 31, 1996 wherein there was an entry for Ms. Kazyak in the amount of \$33,000. [Exhibit 7]. In that Schedule, in a separate entry, Ms. Kazyak caused to be reported that the Committee owed her \$78,100 in additional compensation over and above the \$33,000." (Id. at 11 at 4).

18. "[Mr. Racer] ordered this knowingly false entry for May 31, 1996 ... [be] removed by the Committee's CPA in order to make the disclosure accurate. This was the third unauthorized and unilateral alteration of a monthly disclosure statement she attempted to be filed with the FEC which [Mr. Racer] ordered corrected." (Id. ¶ 12 at 4).

19. "In addition, Ms. Kazyak unilaterally altered the amount owed by the Committee to its press secretary, Edmond Peterson, in Schedule D-P of the June 30, 1996 filing. Mr. Peterson was in fact paid at the rate of \$2,500 per month. Without authorization, Ms. Kazyak changed his agreed upon rate of compensation and inserted a non-existent claim \$92,500. At that time the Committee was current in its payments to Mr. Peterson, an independent contract, under the terms its agreement with him. The Committee did not owe him \$92,500. [Mr. Racer] also ordered that alteration removed to properly reflect the Committee's financial obligation. Ms. Lewis discussed this very issue with Mr. Peterson and he of course agreed that the corrected Schedule ordered by me caused the disclosure to be true and accurate and

that Ms. Kazyak's altered numbers were obviously not." (Id. ¶ 13 at 4-5).

20. "Further, to the best of [Mr. Racer's] knowledge, all campaign workers understood that the Committee might not have the funds to pay them on a regular basis." (Id. 14 at 5).

21. "[The] Committee has followed a policy and practice of making true and accurate disclosure of its transactions, as ... required ... by law. Ms. Kazyak violated that policy and practice." (Id. ¶ 15 at 5).

22. "Because of the incidents [of impropriety] mentioned above and other considerations, Ms. Kazyak's services were discontinued [by Mr. Racer] effective July 31, 1996." (Id. ¶ 16 at 5).

PRESIDENTIAL MONTHLY DISCLOSURE FILINGS

The following chart contains excerpts from the monthly reports filed by the Committee pursuant to 2 U.S.C. § 434 (a) (3) and 11 C.F.R. § 104.5 (b), during the period January through August 1996:

Report Date	Name of Claimant	Nature of Claim	Outstanding Balance Beginning	Amount of Debt this Period	Payment this Period	Outstanding Balance Ending
2/96	Kazyak	professional services	23,100.00	3,300.00	0.00	26,400.00
3/96	Kazyak	professional services	26,400.00	3,300.00	3,000.00	26,700.00
4/96	Kazyak	professional services	26,700.00	6,300.00	0.00	33,000.00

Report Date	Name of Claimant	Nature of Claim	Outstanding Balance Beginning	Amount of Debt this Period	Payment this Period	Outstanding Balance Ending
5/96	Kazyak	professional services	33,000.00	0.00	0.00	33,000.00
6/96	Kazyak	professional services	33,000.00	3,300.00	3,300.00	33,000.00
7/96	Kazyak	professional services	33,000.00	3,300.00	3,300.00	33,000.00

The Committee accurately disclosed the amount of money owed Ms. Kazyak in each of its monthly reports, which was \$3,300 per month. (**Exhibit 1**, Racer Aff. ¶ 4 at 1-2).

According to Ms. Kazyak, she filed for bankruptcy on July 25, 1996. In November 1996, the Committee's counsel was in contact with Ms. Kazyak's bankruptcy counsel. Her attorney took the position that unless her demand for payment to the bankruptcy trustee of more than \$60,000 was met, she would file a complaint with the FEC. On that basis, the Committee of course declined her offer as improper. (**Exhibits 11 and 12**).

ARGUMENT

1. **The Unilateral Alteration and/or Falsification of Monthly Reports of the Committee Did Not Convert the Falsified Amounts Into Debts Within the Meaning of the Regulations**

A political committee subject to federal election law is at all times legally obligated to make truthful and accurate statements in its financial disclosure statements filed with the

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FEC. This obligation extends to the monthly statements the Committee discovered Ms. Kazyak altered.

The Act provides that "[w]hen the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required by the Act for the political committee, any report of such committee shall be considered in compliance with the Act." 2 U.S.C. § 432(i) (emphasis added). Indeed, a political committee must be mindful that the FEC is an agency of the United States. The filing of a false financial statement with the FEC brings into play the false and fraudulent statement provision of the criminal code. 18 U.S.C. § 1001. Additionally, any person who knowingly and willingly commits a violation of the Act which involves an expenditure aggregating \$2,000 or more during a calendar year is subject to severe criminal sanctions. 2 U.S.C. § 437g(d)(1)(A).

In United States v. Hopkins, 916 F.2d 207, 214 (5th Cir. 1990) the court upheld convictions under 2 U.S.C. § 1001 based on a scheme to disguise corporate contributions by individuals who controlled a political committee through the mechanism of filing false financial reports with the FEC, i.e. "the defendants deliberately conveyed information they knew to be false to the Federal Election Commission." Id. at 215. Hopkins supports the reasoned approach taken by Mr. Racer here.

Under 11 C.F.R. §§ 104.3(d) and 104.11, "if [a] creditor has provided something of value to the political committee," the political committee is to report the debt, even if the committee

disputes the debt. 11 C.F.R. § 116.10. However, a "disputed debt" is defined to mean

an actual or potential debt or obligation owed by a political committee, including an obligation arising from a written contract, promise or agreement to make an expenditure, where there is a bona fide disagreement between the creditor and the political committee as to the existence of the obligation owed by the political committee.

11 C.F.R. § 116.1(d) (emphasis added). ¹ The operative term here is "bona fide disagreement."

We submit that Ms. Kazyak's unauthorized alteration of monthly reports increasing her agreed upon compensation several fold did not satisfy the bona fide requirement of 11 C.F.R. § 116.1(d). The Committee did not then and does not now interpret the regulations to impose a legal duty on the Committee to contravene the explicit imperatives of federal statutes making it a criminal offense to mislead or omit material information in a federal agency by knowingly filing a false document. When financial data was prepared under the supervision of Mr. Racer for approval and signature by to the Treasurer of the Committee and filing with the FEC, a clear and unequivocal duty was

¹ Where a debt or obligation is greater than \$500, the reporting committee shall report it "as of the date on which the debt or obligation is incurred, except that any obligation incurred for . . . salary or other regularly reoccurring administrative expense shall not be reported as a debt before the payment due date." 11 C.F.R. § 104.11(b) (emphasis supplied). The committee's reporting obligation - even of disputed debts and obligations - continues until the debts and obligations are extinguished. 11 C.F.R. §§ 104.11(a), 116.10(a). Separate schedules stating "the circumstances and conditions under which each debt and obligation was incurred or extinguished" must be filed with the reports. 11 C.F.R. § 116.10(a).

imposed on Mr. Racer and the Committee to accurately state the true amounts the Committee was obligated to pay Ms. Kazyak. Mr. Racer did so. To interpret his obligation otherwise would be contrary to an objective, good faith reading of the Act and related federal statutes.

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The unlawfully altered entries of Ms. Kazyak did not amount to invoices of a creditor. Invoices were never provided. An altered financial report certainly was not an invoice. Mr. Racer reacted appropriately when by memorandum dated June 20, 1996, he stated that Schedule D-P of the May report showed an entry of \$78,100 owed to Ms. Kazyak, and that until he "receive[s] a valid written claim from Ms. Kazyak, indicating the authorizing party for this obligation, [he would] not consider this a valid claim against the committee." (Exhibit 13). No such claim was submitted to him. Mr. Racer took a reasonable approach to Ms. Kazyak's ill-advised actions, and he was immensely charitable. While her conduct was unconscionable, the Act did not mandate him to disclose her true financial improprieties in an FEC filing for purposes of the public record. Taken to its logical conclusion, Ms. Kazyak urges that the Committee should have exposed her for what she was, at best ill-advised and at worst not honest. What that would have accomplished in the scheme of things under the public disclosure objectives of the Act is highly questionable.

It is fundamental to the law of agency that the unauthorized acts of an agent are not binding on the principal committed when they are outside the scope of the agent's apparent authority.

Ms. Kazyak was not authorized to alter the Committee's FEC filings or to give herself a raise, let alone a several fold raise.

The Act and the regulations did not obligate the Committee to accord a knowingly improper and false statement of purported debt a classification of a disputed claim, and that is necessary to trigger the reporting requirement. There simply was nothing disputed about the entry; rather, it was false.

2. The Falsely Inflated Amounts Inserted by Ms. Kazyak in the Committee's Monthly Reports Did Not Create a Loan or an In-Kind Contribution Equal to the Difference Between the Inflated Amount and the Previously Agreed Upon Compensation

The Complaint reasons that the difference between the \$10,400 per month Ms. Kazyak attempted to show the Committee as owing her and the \$3,300 the Committee actually agreed to pay her constituted an in-kind contribution in the amount of the difference, \$7,100. The individual campaign contribution limitation for each candidate is \$1,000. 2 U.S.C. § 441a(a)(1)(A). Once again, a false claim cannot be understood to thereby create a contribution and trigger the campaign contribution limitation obligations.

The regulations provide that an unpaid amount for services rendered "in accordance with an employment contract or a formal or informal agreement" may be treated as a debt. 11 C.F.R. § 116.6(a). The Committee was in compliance with its obligation under this provision. The regulations do not intend to cause a falsified claim to be construed as a debt or reported as a debt.

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The assertion of an in-kind contribution also reflects flawed reasoning.

The Committee agreed to pay Ms. Kazyak, and she agreed to accept, compensation of \$2,000 per month. Subsequently, the Committee agreed to pay and she agreed to accept \$3,300 per month. What Ms. Kazyak agreed to accept and what the Committee agreed to pay her established her market rate at a given point in time. Based on the description of her duties as those essentially of an administrative assistant, it would be a tough proof indeed for this complainant to make a showing that her market rate was more than the \$39,600 per year the Committee states it agreed to pay her. Certainly the nature of her duties and the amounts paid true senior staff support the Committee's position.

The regulations provide that "[u]nless specifically exempted under 11 C.F.R. 100.7(b), the provision of any good or service without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." 11 C.F.R. 100.7(a)(E)(iii)(A). "If goods or services are provided at less than the usual an normal charge, the amount of the in-kind contribution is the difference between the usual and normal charge for the goods or services at the time of the contribution and the amount charged the political committee." Id.

The claims that she was worth more than she agreed to accept and more than the Committee agreed to pay her are patently suspect. Ms. Kazyak has offered no evidence to show that at the

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times in question the compensation rate she agreed to was less than her obvious or readily known market rate (her professional rate as she calls it) and that she can offer evidence to show what the market rate was. In this respect her claims are unreasonable and unfair.

Just as importantly, the Committee did not know and indeed had no reason to know that there was an enormous hidden value in her services which exceed her agreed upon compensation by more than \$70,000 per year.

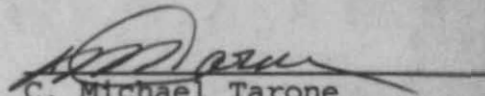
Ms. Kazyak also argues in the alternative that the Committee failed to report a loan from her in the amount of the monthly \$7,100 differential. 11 C.F.R. § 116.6(a). There was no reason for the Committee to treat the altered monthly reports as invoices or creditor claims. There simply was no reason to do so at that time.²

² The Committee will continue to review the matter of Ms. Kazyak in light of the developments in the fall of 1996 when there were communications with her bankruptcy counsel and the trustee in bankruptcy to reflect the events accordingly in the Committee's filings, and if deemed necessary through an amended filing disclosing the improprieties.

CONCLUSION

The Committee respectfully requests that the Complaint be dismissed and that no further action be taken.

Respectfully submitted,

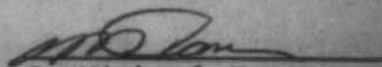

C. Michael Tarone
D.C. Bar No. 159228
The Federal Bar Building
1815 Pennsylvania Avenue, N.W.
Suite 906
Washington, D.C. 20006
(202) 457-6680

Counsel for
Alan Keyes for President
'96, Inc.

CERTIFICATE OF SERVICE

I, C. Michael Tarone, hereby certify that a copy of the foregoing Response of Alan Keyes for President '96, Inc. to Complaint of Kristin R. Kazyak was served facsimile this 6th day of February 1997 without exhibits and by hand on the 7th day of February 1997 with exhibits on the following individuals:

F. Andrew Turley, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463


C. Michael Tarone

BEFORE THE
FEDERAL ELECTION COMMISSION

KRISTIN R. KAZYAK
128 West Main Street
Front Royal, VA 22630,

Complainant,

v.

ALAN KEYES FOR PRESIDENT, INC.
c/o David G. Racer, Jr.
2515 White Bear Ave.
Suite 8-A-301
St. Paul, MN 55109,

Respondent.

MUR-4587

INDEX TO RESPONSE OF ALAN KEYES FOR PRESIDENT '96, INC.
TO COMPLAINT OF KRISTIN R. KAZYAK

<u>EXHIBIT NO.</u>	<u>DESCRIPTION OF EXHIBIT</u>
1	Affidavit of David Racer, National Campaign Manager for Alan Keyes for President '96, Inc.
2	Affidavit of Mary Parker Lewis, Chief of Staff for Alan Keyes for President '96, Inc.
3	Excerpt of Schedule D-P, for February 1996, of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)
4	Excerpt of Schedule D-P, for March 1996 of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)
5	Excerpt of Schedule D-P, for April 1996, of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)
6	Excerpt of Schedule D-P, for May 1996, of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)

EXHIBIT NO. DESCRIPTION OF EXHIBIT

- 7 Excerpt of Schedule D-P, for June 1996, of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)
- 8 Excerpt of Schedule D-P, for July 1996, of Alan Keyes for President '96, Inc. (entry of "debt" of political committee owing to Kristin R. Kazyak)
- 9 Complaint of Kristin R. Kazyak, dated November 11, 1996
- 10 Memorandum of Kristin R. Kazyak to Bankruptcy Trustee, attached to Complaint to FEC
- 11 Letter from C. Michael Tarone, Esq. to Roy A. Wolfe III, Esq. (counsel for Ms. Kazyak's creditors' committee), dated November 19, 1996
- 12 Letter from C. Michael Tarone, Esq. to Francis Chester, Esq. (counsel for Ms. Kazyak), dated November 15, 1996
- 13 Memorandum from Dave Racer to senior staff and outside counsel referring to the May 1996 report and Schedule D-P

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EXHIBIT 1

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BEFORE THE
FEDERAL ELECTION COMMISSION

KRISTIN R. KAZYAK
128 West Main Street
Front Royal, VA 22630,

Complainant.

v.

ALAN KEYES FOR PRESIDENT,
'96, INC.
c/o David G. Racer, Jr.
2515 White Bear Ave.
Suite 8-A-301
St. Paul, MN 55109,

Respondent.

MUR 4587

AFFIDAVIT OF DAVID RACER

I, David G. Racer, being duly sworn do swear under penalty of perjury that the following statements are true and correct to my best knowledge, information and belief:

1. I, David G. Racer, Jr. am the National Campaign Manager for Alan Keyes for President '96, Inc. ("Committee") and I have served in that capacity since January 15, 1996.

2. The Committee was the principal campaign committee of Alan L. Keyes candidacy for the Republican nomination for the office of President of the United States of America.

3. In the course of the primary election effort, AKP relied chiefly on unpaid volunteers. There were very few paid positions. We operated out of two principal campaign locations: Alexandria, Virginia; and St. Paul, Minnesota.

4. In February 1996, I had a telephone conversation with Ms. Kazyak in which we discussed her

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compensation. In that conversation, she expressed to me her belief that the Committee had agreed to pay her at a rate high enough to pay the debt service on her credit card debt. She suggested to me that her monthly credit card debt service cost was \$3,300, or \$ 39,300 annually. While this amount was far greater than the \$2,000 monthly amount the Committee's Chief of Staff Mary Parker Lewis had suggested to pay Ms. Kazyak, I felt the \$3,300 was fair and reasonable and that the Committee could afford it. Exercising my authority as the National Campaign Manager, I entered into an agreement with Ms. Kazyak to pay her at the rate of \$3,300 per month retroactive to her start date with the Committee, July 1995. There is no doubt in my mind that in this telephone conversation Ms. Kazyak and I agreed to \$3,300 per month as just compensation.

5. Under federal law, the Committee was obligated to file monthly disclosure statements with the FEC during the course of the 1996 election year. In the February 1996 disclosure statement filed with the FEC, the Committee disclosed its indebtedness to Ms. Kazyak in the amount of \$26,400, which was based on service over a period of eight (8) months at \$3,300 per month. This disclosure is reflected on page 5 of Schedule D-P for the period ending February 29, 1996. This disclosure is consistent with my previous conversation with Ms. Kazyak.

6. In April 1996, Mary Parker Lewis telephoned me regarding an entry she discovered in the March 31, 1996 disclosure statement. She advised me that Ms. Kazyak had

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apparently unilaterally inserted in the Committee's Schedule D-P filing an amount owed to her which was several times greater than the agreed upon \$3,300 per month compensation. My best memory is that the amount Ms. Kazyak inserted was \$10,400 a month. I was shocked. I concurred in the concern Ms. Lewis expressed because Ms. Kazyak had enjoyed the trust of the Committee and had access to its books and records. She in fact assisted in the preparation of the disclosure statements filed with the FEC.

7. Confronted with a circumstance where a campaign functionary unilaterally increased her agreed upon compensation rate by more than 200% very late in the day on the eve of an FEC filing deadline, I directed, after consultation with staff, that the false entry be removed, and that the correct amount, \$3,300, be inserted in order to comply with the Committee's understood obligation to file accurate reports. In my opinion, a disclosure form reflecting Ms. Kazyak's altered amount would have been inaccurate, false and misleading and possibly a violation of law. I believed then as I do now that I had a legal duty to prevent the altered and false amount from being included in the Committee's filing.

8. In my opinion, I was confronted with an unauthorized act by a functionary which raised immediate concern as to her judgment and honesty. In light of the practices of this Committee to be fair and understanding towards those working for the campaign, I did not terminate Ms. Kazyak although this alone was ground for doing so. However, I did discuss this issue with

her and I told her to remove the altered amount and insert the correct amount. She did so. The agreed upon \$3,300 monthly amount was inserted. I have no explanation for her assertion in March 1996 that she was due the outlandish amount of more than \$10,000 per month.

9. I would like to point out that I have been paid at the monthly rate of \$5,000. The Chief of Staff has been paid at the rate of \$7,000 per month.

10. I would also like to point out that the office manager for the Committee at its St. Paul headquarters who has essentially the same duties as Ms. Kazyak was paid at the rate of \$400 per week or \$1,650 per month until the past week when her compensation was raised to \$450 per week.

11. On or about June 19, 1996, I received a facsimile copy of Schedule D-P for the period ending May 31, 1996 wherein there was an entry for Ms. Kazyak in the amount of \$33,000. In that Schedule, in a separate entry, Ms. Kazyak caused to be reported that the Committee owed her \$78,100 in additional compensation over and above the \$33,000.

12. I ordered this knowingly false entry for May 31, 1996 to be removed by the Committee's CPA in order to make the disclosure accurate. This was the third unauthorized and unilateral alteration of a monthly disclosure statement she attempted to be filed with the FEC which I ordered corrected.

13. In addition, Ms. Kazyak unilaterally altered the amount owed by the Committee to its press secretary, Edmond Peterson, in

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Schedule D-P of the June 30, 1996 filing. Mr. Peterson was in fact paid at the rate of \$2,500 per month. Without authorization, Ms. Kazyak changed his agreed upon rate of compensation and inserted a non-existent claim \$92,500. At that time the Committee was current in its payments to Mr. Peterson, an independent contract, under the terms its agreement with him. The Committee did not owe him \$92,500. I also ordered that alteration removed to properly reflect the Committee's financial obligation. Ms. Lewis discussed this very issue with Mr. Peterson and he of course agreed that the corrected Schedule ordered by me caused the disclosure to be true and accurate and that Ms. Kazyak's altered numbers were obviously not.

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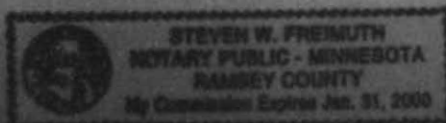
15. This Committee has followed a policy and practice of making true and accurate disclosure of its transactions, as I believe we are required to do by law. Ms. Kazyak violated that policy and practice.

16. Because of the incidents mentioned above and other considerations, Ms. Kazyak's services were discontinued effective July 31, 1996.


David G. Racer

Notarization

On this 6TH day of February 1997 appeared before me David G. Racer and stated the foregoing to be true and correct to her best knowledge, information and belief.



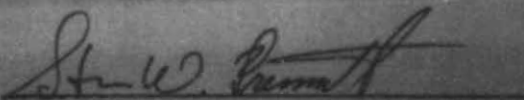

Notary

EXHIBIT 2

98043893732

BEFORE THE UNITED STATES
FEDERAL ELECTION COMMISSION

KRISTIN R. KAZYAK
128 West Main Street
Front Royal, VA 22630,

Complainant,

v.

ALAN KEYES FOR PRESIDENT, INC.
c/o David G. Racer
2515 White Bear Ave.
Suite 8-A-301
St. Paul, MN 55109,

Respondent.

MUR 4587

AFFIDAVIT OF MARY P. LEWIS

I, Mary Parker Lewis, being duly sworn do swear under penalty of perjury that the following statements are true and correct to my best knowledge, information and belief:

1. I served as the Chief of Staff for Alan Keyes for President '96, Inc. ("AKP" or "Committee"), the principal campaign committee supporting the candidacy of Alan L. Keyes for the Republican nomination for President in 1996.

2. Kristin R. Kazyak initially served as a volunteer for the Keyes campaign, and later served as a private contractor for secretarial services to the Committee. During that entire period of time, from July 1, 1995 through July 31, 1996, Ms. Kazyak worked under my direct supervision. I sharply dispute paragraphs 2-4 of the Memo to Trustee as absolute fiction. I never solicited Ms. Kazyak's services to the Committee; I never asked

for, nor was I provided any "Campaign Activity" or other political services resume by Ms. Kazyak; I never "hoped to be able to hire [Ms.Kazyak] to handle administrative and computer work for the Keyes campaign." Ms. Kazyak, as a campaign volunteer, did herself for a matter of several months attempt to solicit contract work from me in my capacity as an officer of AKP.

3. When Ms. Kazyak first started working as a volunteer for the Committee, she told me that she had a significant amount of outstanding personal debt. I advised Ms. Kazyak numerous times of the financial limitations of a committee such as ours. I informed her that should she be hired for services, it could only be as a contractor for secretarial and support staff services, not for computer or systems analysis work. I informed her that such secretarial work would command only the same rate as her predecessor was paid in the position. The position was primarily data entry and low-level clerical tasks, for which the Committee would pay only \$2,000 per month, paid intermittently as cash flow allowed. I advised Ms. Kazyak that in her circumstances, she should seek ²more lucrative source of income elsewhere. Ms. Kazyak, however, professed herself committed to Ambassador Alan Keyes' candidacy for the Presidency, and when it came open, she solicited the secretarial position, and accepted the \$2,000 rate.

4. At the time Ms. Kazyak started working for AKP, she was unemployed, and had been for many months. Although Ms. Kazyak

had apparently been interviewing in the private sector, I understand that she did not have any job offers when she started working for AKP. Throughout her association with AKP, I encouraged her to try to secure a source of income elsewhere with better remuneration, going so far as to facilitate some interviews and supplemental contract work for her.

5. Ms. Kazyak had no political campaign employment experience whatever, and very little volunteer experience. She had no familiarity with campaign or accounting software, nor, to my knowledge, any accounting training or background. At her insistence, she ultimately performed all her data entry and secretarial tasks in a single word processing program, Word Perfect 3.1. Because she refused to learn any standard accounting program, even though my consulting firm and the campaign purchased several for her use, I finally allowed her to set up her own graphs and charts for data entry purposes. At no time whatever did she design, engineer, manipulate or manage the campaign's master data base. It is my understanding that she never had direct access to it, nor the technical competence to operate within it. She was not authorized to do so. She did, on a very few occasions, provide limited data entry, which may have been transferred directly into it via disc or electronic transfer.

6. Ms. Kazyak's job at AKP consisted primarily of clerical and receptionist tasks in the Alexandria office, for which she seemed suited in light of her secretarial and data processing

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experience. Ms. Kazyak did not perform any highly specialized technical processes or functions for the Committee, as she claims. She photocopied, she data-entered, she answered the phone, she opened mail. Her position was that of an office assistant. She occasionally requested, and was in a very few instances accommodated, in being allowed to staff the candidate at appearances in the Washington metro area, so she could video or audio tape his remarks. She was not hired to tape or transcribe his campaign or personal appearances, nor was she promised remuneration for doing so. The Committee had several volunteers around the country providing such services, and making transcripts available to the volunteers' internet site. I sharply dispute paragraph 9 of the Memo to the Trustee, at 2-3, which is attached to the complaint.

7. All of the references in Ms. Kazyak's complaint regarding her automated or computer systems duties are either false or exaggerated to the point of delusion. On two or three occasions, she assisted another campaign functionary at a different office location with quite routine software or accessory upgrades. Our office contained one 486 PC, of which Ms. Kazyak had virtually sole use. That she was not requested nor required to use her own equipment in her data entry tasks is substantiated by the sorry fact that most of her financial report work remains passworded on the Alexandria office equipment, and is inaccessible to this Committee and to the FEC audit team seeking it.

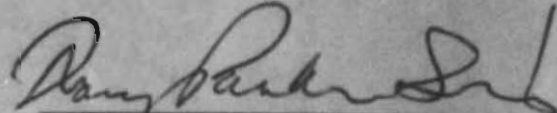
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8. Ms. Kazyak agreed to work for AKP at the rate of \$2,000 per month. Ms. Kazyak worked directly under my supervision as an office assistant. I oversaw, among other things, her in-put of financial data for Federal Election Commission ("FEC") reporting purposes, mostly involving accounts payable and the itemization of debt. Ms. Kazyak was not delegated by me or any other official of AKP to authorize debt claims, nor to exercise any other discretionary judgment regarding AKP's liabilities, obligations, or operations. Moreover, Ms. Kazyak was never designated "senior staff;" she was not privy to consultations or decision-making within the high levels of the campaign; the title she used among volunteers and the internet community as "new media contact" and other such designations were self-styled, unsolicited, but in the view of the Committee's press secretary and other senior staff both meaningless and harmless, and hence tolerated. Finally, no proposals or initiatives for automated or computerized systems or functions were desired or solicited from Ms. Kazyak by the Committee.

9. In contravention of her assigned duties and without any authority to do so, Ms. Kazyak entered on draft FEC reports amounts of money she - and only she - believed AKP owed her. Ms. Kazyak and I, together with David Racer, National Campaign Manager for AKP, discussed Ms. Kazyak's improper entries of data on draft reports. During these discussions, Ms. Kazyak acknowledged that no officer of AKP had agreed to or authorized the amounts she arbitrarily had entered. She merely asserted that

it was a matter of "justice," that she was entitled to such amounts, and that she believed they represented "a professional hourly rate" for her services. Ms. Kazyak subsequently withdrew her claim for compensation at such an exaggerated rate, and at the direction of the campaign manager, David Racer, Ms. Kazyak herself re-entered on the FEC draft reports a revised compensation rate. This rate, of \$3,300 per month, was proposed by Ms. Kazyak herself, and generously accepted by the campaign manager, David Racer, over my objections, but with my final concurrence.

980438933738 10. In light of Ms. Kazyak's statements to me when she first started working for AKP in July 1995 that she had a significant amount of personal debt, and given her failure to secure a more lucrative source of income than AKP had offered her, I believed that these instances of fraudulent entry represented Ms. Kazyak's frustration and desperation at her personal financial situation. I believe she resorted to a strategy of surreptitiously slipping into the FEC reports amounts sufficient to cover her personal debt, and hoping that AKP would in fact pay her "claim." No one at AKP wanted to embarrass Ms. Kazyak and, in an act of kindness, we let her stay on, even as we transferred responsibilities away from her. I tried to counsel Ms. Kazyak in debt management and referred her to Dewey Crepeau, who also worked at AKP and who was a practicing attorney, and C. Michael Tarone, counsel for AKP. I understand that Mr. Crepeau advised Ms. Kazyak to file for bankruptcy.

11. However, during the summer of 1996, Ms. Kazyak became more obstinate in asserting her "claims" by continuing to in-put them in draft reports. Mr. Racer terminated Ms. Kazyak's relationship with AKP, effective July 31, 1996.


Mary Parker Lewis

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Notarization

On this 7th day of February 1997 appeared before me
Mary Parker Lewis and stated the foregoing to be true and correct
to her best knowledge, information and belief.

Eileen Steele
Notary

NOTARY PUBLIC - VIRGINIA
EILEEN STEELE
My Commission Expires September 30, 1999



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EXHIBIT 3

98043893741

Rec'd 29th, 1996

SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Jeannine Stroth 401 S Carson St Carson City NE 89710			02 29 96	02 23 96	
Nature of debt	event	1241 92	0.00	1241 92	0 00
Jill Braden 3001 Park Ctr Dr Alexandria VA 22302			02 29 96		
Nature of debt	secretarial fees	9040.63	0.00	0.00	9040 63
Jonathon Roberts Po Box 10469 Charlotte NC 28212			02 29 96		
Nature of debt	hotel expenses	0.00	56.00	0.00	56 00
K&K Insurance Group 1712 Magnavox Way PO Box 2338 Fort Wayne IN 46801-2338			02 29 96		
Nature of debt	campaign liability ins	1069.50	0.00	0.00	1069 50
KKCM AM Radio MD 54 1107 Hazeltine Blvd Suite 520 Chaska MN 55318-1043			02 29 96		
Nature of debt	studio rental	74.14	-2.14	72 00	0 00
Klaus Nighuis 50 Elm St Manchester NH 03101			02 29 96		
Nature of debt	office exp reimb	525.00	0.00	0.00	525 00
Kristin R. Kazyak 316 Frazer Place Front Royal VA 22360			02 29 96		
Nature of debt	professional services	23100.00	3300.00	0.00	26400 00
Larry McClaine 4169 Botanical Dr St Louis MO 63110			02 29 96	02 12 96	
Nature of debt	phones	275.24	0.00	275 24	0 00
Lion & Fox Studios 7532 Fullerton Ct Springfield VA 22153			02 29 96	02 23 96	
Nature of debt	audio product	1890.00	0.00	1000.00	890 00
Mary Parker Lewis 4700 Surry Place Alexandria VA 22304			02 29 96		
Nature of debt	travel	16568 20	0 00	0 00	16568 20

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EXHIBIT 4

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Period ending March 31, 1996

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Alan Keyes for President '96					
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630 Nature of debt	professional services	26400.00	3300.00	3000.00	26700.00
Lion & Fox Studios 7532 Fullerton Ct Springfield VA 22153 Nature of debt	audio tapes	890.00	0.00	0.00	890.00
Mary Parker Lewis 4700 Surry Place Alexandria VA 27304 Nature of debt	travel	16568.20	0.00	0.00	16568.20
MCI Network MCI Conferencing PO Box 85053 Louisville KY 40285 Nature of debt	telephone adjusted	3777.26	-1127.26	2850.00	0.00
MCI Preferred PO Box 85053 Louisville KY 40285 Nature of debt	telephone adjusted	1748.57	-448.57	1300.00	0.00
Metro Productions 6005 Chapel Hill Rd Raleigh NC 27607 Nature of debt	printing	1754.79	0.00	0.00	1754.79
Minnesota Public Radio 45 E 7th St St Paul MN 55101 Nature of debt	studio rental	300.00	0.00	0.00	300.00
Mutual Travel 1201 3rd Av Suite 1800 Seattle WA 98101 Nature of debt	travel	23989.87	0.00	8989.87	15000.00
Nova Label Co 4819 Lydell Road Cheverly MD 20781 Nature of debt	printing	4134.27	0.00	0.00	4134.27
Oakland Hilton 1 Hegenberger Road PO Box 2549 Oakland CA 94614 Nature of debt	travel	1601.88	0.00	0.00	1601.88

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EXHIBIT 5

98043893745

Period ending, April 30, 1996

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
Karn Autoproducts Inc PO Box 1005 Green Bay WI 54307 Nature of debt	printing	1018.24	0.00	0.00	1018.24
Kent A Franklin 29 Kensington Ct Appleton WI 54915 Nature of debt	advertising	345.09	0.00	345.09	0.00
Klaus Nijhuis 50 Elm St Manchester NH 03101 Nature of debt	office expense	525.00	0.00	525.00	0.00
Kris Logeman W290 N8308 Florence, WI 53029 Nature of debt	event rental	0.00	331.50	0.00	331.50
Kristin R Kazzyk 316 Frazier Place Front Royal VA 22630 Nature of debt	professional services	26700.00	6300.00	0.00	33000.00
Larry McClaine 4169 Botanical St Louis MO Nature of debt	office - phone - travel - event	0.00	2578.55	0.00	2578.55
Larsen's Printing 1300 Pierce St Sioux City IA 51105 Nature of debt	printing	784.00	0.00	0.00	784.00
Leroy Rahn 3230 N Oneida St Appleton WI 54911 Nature of debt	advertising	200.00	0.00	200.00	0.00
Liberty Marketing 523 E 9th St Schuyler NE 68661 Nature of debt	marketing consultant	6000.00	0.00	0.00	6000.00
Linda Saubers 4215 Beaufort Dr Brookfield WI 53045 Nature of debt	postage	130.45	0.00	130.45	0.00

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EXHIBIT 6

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Period ending May 31, 1996

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SCHEDULE D-P

ALAN KEYES FOR PRESIDENT '96, INC
DEBTS AND OBLIGATIONS
EXCLUDING LOANS

LINE # 12

NAME OF COMMITTEE Alan Keyes for President '96	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
K & K Insurance 1712 Magnevox Way PO Box 2338 Fort Wayne IN 46801-2338	insurance (adjusted) ¹	1069.50	-1069.50	0.00	0.00
Nature of debt:					
KAIM Radio 3555 Harding Ave Honolulu HI 96816	spots	393.76	0.00	0.00	393.76
Nature of debt:					
Kam Autoproducts Inc. PO Box 1005 Green Bay WI 54307	printing	1018.24	0.00	0.00	1018.24
Nature of debt:					
Kris Logeman W290 N8308 Florence OH Hardland WI 53029	event rental	331.50	0.00	0.00	331.50
Nature of debt:					
Kristin R Kazyak 316 Frazier Place Front Royal VA 22630	professional services	33000.00	0.00	0.00	33000.00
Nature of debt:					
Larry McClaine 4169 Botanical St Louis MO	phones	2578.55	0.00	1275.63	1302.92
Nature of debt:					
Larsen's Printing 1300 Pierce St Sioux City IA 51105	printing	784.00	0.00	784.00	0.00
Nature of debt:					
Liberty Marketing 523 E 9th St Schuyler NE 68651	marketing consultant	6000.00	0.00	0.00	6000.00
Nature of debt:					

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EXHIBIT 7

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Period ending June 30, 1996

7 of 13

ALAN KEYES FOR PRESIDENT '96, INC.
DEBTS AND OBLIGATIONS

SCHEDULE D-P

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	LINE #12 OUTSTDG BALANCE ENDING
KARN AUTOMOTIVE PRODUCTS, INC.	Primary			6/3/96	
PO BOX 1005					
	PRINTING				
GREEN BAY WI 54307		\$1,018.24		\$1,018.24	\$0.00
KRIS LOGEMANN	Primary			6/4/96	
W290 N8308 FLORENCETTA H					
HARDLAND WI 53029	EVENT RENTAL	\$331.50		\$331.50	\$0.00
KRISTIN KAZYAK	Primary			6/5/96	
316 FRAZIER PLACE					
	PROFESSIONAL FEES				
FRONT ROYAL VA 22380		\$33,000.00	\$3,300.00	\$3,300.00	\$33,000.00
LARRY MCCLAIN	Primary			6/4/96	
4169 BOTANICAL					
ST LOUIS MO 63110	TELEPHONE	\$1,302.92		\$1,302.92	\$0.00
LIBERTY MARKETING	Primary			6/4/96	
523 E 9TH ST					
SCHUYLER NE 68661	MARKETING CONSULTANT	\$6,000.00		\$1,500.00	\$4,500.00
LION & FOX STUDIOS	Primary				
7532 FULLERTON CR					
	AUDIO TAPES				
SPRINGFIELD VA 22153		\$131.25		\$0.00	\$131.25
LON MABON	Primary			6/4/96	
PO BOX 9127					
	PROFESSIONAL FEES				
BROOKS OR 97305		\$27,000.00		\$3,000.00	\$24,000.00
LORETTA NEET	Primary			6/4/96	
898 S 38TH ST					
SPRINGFIELD OR 97478	TRAVEL	\$5,435.43		\$1,435.43	\$4,000.00

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EXHIBIT 8

98043893751

Revised schedule July 31, 96

ALAN KEYES FOR PRESIDENT '96, INC.

SCHEDULE H-P

DEBTS AND OBLIGATIONS

EXCLUDING LOANS

LINE #12

NAME OF COMMITTEE	PURPOSE OF DISBURSEMENT	OUTSTDG BALANCE BEGINNING	AMOUNT INCURRED THIS PERIOD	PAYMENT	OUTSTDG BALANCE ENDING
JAMES PHILLIPS	Primary			7/15/96	
PO BOX 5165					
	PROFESSIONAL FEES				
CULVER CITY CA 90231		\$3,000.00	\$0.00	\$3,000.00	\$0.00
JILL BRADEN	Primary			7/3/96	
3001 PARK CTR DR					
	PROFESSIONAL FEES				
ALEXANDRIA VA 22302		\$6,868.00		\$1,000.00	\$5,868.00
JOE GLOVER C/O BAASEIAH 7554 SAND ST	Primary			7/3/96	
	PROFESSIONAL FEES				
FORT WORTH TX 0		\$28,818.31		\$2,500.00	\$26,318.31
JOON PARK	Primary			7/3/96	
LIBERTY UNIVERSITY BOX 23026 LYNCHBURG VA 24506		\$2,000.00		\$1,000.00	\$1,000.00
JOYCE DOWNEY	Primary				
PO BOX 3023					
	FUNDRAISING				
SCOTTSDALE AZ 85271		\$0.00	\$2,842.47	\$0.00	\$2,842.47
KAREN WALKER	Primary				
403-A FERNLEAF AVE					
	FUNDRAISING				
CORONA DEL MAR CA 92625		\$0.00	\$1,700.00	\$0.00	\$1,700.00
KRISTIN KAZYAK	Primary			7/31/96	
316 FRAZIER PLACE					
	PROFESSIONAL FEES				
FRONT ROYAL VA 22380		\$33,000.00	\$3,300.00	\$3,300.00	\$33,000.00
LIBERTY MARKETING	Primary				
523 E 9TH ST					
	MARKETING CONSULTANT				
SCHUYLER NE 68661		\$4,500.00			\$4,500.00

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EXHIBIT 9

98043893753

Kristin R. Kazyak
28 W Main Street
Front Royal, VA 22630

Long Distance: 800-575-7874
Home Office: 540-636-8639

November 11, 1996

Reporting Requirement Violation

TO: *Larry Noble* FEC General Counsel's Office, 999 E Street, NW, DC 20463

COMMENTS: Attached please find:

1. Complaint (3 copies signed and notarized) to the FEC General Counsel, Larry Noble, regarding violations of the Reporting Requirement (statute 434 and CFR §104 as well as statute 437GA1 and CFR §111.4) by the Alan Keyes for President Committee, Inc. This Complaint includes copies of the materials that I prepared and sent to the bankruptcy trustee as well as a cover letter focusing facts of the case regarding the unpaid, unreported invoicing.
2. In both March and May 1996, the Campaign Manager, Dave Racer, authorized signature and filing of the monthly FEC report only after the altering, removal or whiting out (see filed FEC 1996 Reports: March D-P p.5; May 1996 D-P p.7 of 14) of invoicing for the professional fees of Kristin R. Kazyak, employed by the Committee and a member of the senior staff from August 1, 1995 thru July 31, 1996.
3. The repeated removal of ONLY this item of invoicing in the monthly FEC reports, contradicts the NOTE TO MARCH 1996 FEC REPORT filed with Schedule D-P:

...In order to finally identify any and all such contingent liabilities, extensive efforts were undertaken to contact and request data from vendors, service providers, and staff to quantify the claims. The results of this effort are reflected in this report, which compiles asserted indebtedness irrespective of documentation or the committee's belief as to whether there is any legitimate basis for the claim. Claims for compensation based on informal agreement make up a substantial portion of this new debt. This report is made in an effort to meet a strict standard for disclosure of even asserted and unsubstantiated obligations.

4. The Committee's failure to report or compensate these professional services and the invoiced fees led directly to my filing personal bankruptcy July 25, 1996 and constitute as well, an unpaid, unreported individual loan, or "contribution", to the Committee of over \$120,000, well in excess of the individual limit of \$1,000.

County of Warren, Commonwealth of Virginia

The foregoing instrument was acknowledged before me this 11th day of November, 1996.

Kristin R. Kazyak
Kristin R. Kazyak

Helen Babineau
Helen Babineau, Notary Public

My commission expires July 31, 2001

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EXHIBIT 10

9 6 0 4 3 8 9 3 7 5 5

Memo to Trustee
from Kristin R. Kazyak

Employment with the Keyes Campaign August 1, 1995 through July 31, 1996

1. For the past 15 years, I have worked as a private computer and media contractor (see resume ②). In the mid 80s my contractual fee listed at \$60/hr and increased to \$90/hr in 1994 with contract offers from IBM and the International Monetary Fund. At that time I was completing 2 years of research and development to form my own limited partnership and establish a \$2 million dollar multimedia development company projected to open its doors in Scranton PA in April 1995.
2. When Alan Keyes launched his presidential campaign in March 1995, Mary Parker Lewis asked me for my resume in the hope that she would be able to hire me to handle administrative and computer work for the Keyes campaign. Due to the untimely loss of my principal investor in February 1995, I restructured my board of advisors and postponed further development until we met. I emphasized to Mrs. Lewis in April and again in July that I was in no position to do any work, particularly campaign related, that was not contracted full-time and fully compensated. By mid-July, Aegis Corporation had called me for several interviews, and an offer to work with their digital graphics team was under consideration when Mary Parker Lewis informed me that the Committee was in a position to contract my services full-time. At that time, Campaign Manager Sydney Hoff Hay projected campaign contributions, estimated under half a million for the 3rd quarter, would increase to a *minimum* of 3 million by January, and both the Campaign Manager and Mrs. Lewis were confident that fundraising was sufficiently underway to facilitate current campaign debt reduction and the hire of professional staff.
3. At the end of July 1996, the Alan Keyes for President '96, Inc. (AKP) committee recorded receipts of \$3.8 million dollars and over \$611,000 in Federal Matching Funds. The *first* check I received for \$3,300, the *minimum* payment on my professional fees as contracted in July 1995, arrived at the end of June 1996 from the St. Paul office (see last column of July invoice ③ "Sal Paid"). Mary Lewis was limited by counsel to reimburse only the immediate campaign expenses of the Alexandria office from AKP's 1st Union account there.
4. During a mid-July conference-call with Southwest Policy Group, Mary Parker Lewis, Chief of Staff, announced my addition to the senior staff and discussed the details of my agreement and work as I joined the Alan Keyes campaign staff full time. Mrs. Lewis offered during that discussion to pay me the minimum due on my monthly fee each month until the Committee received sufficient campaign funds or contributions to pay professional fees in full. All senior staff on the Committee, whether formally or informally contracted as I was, (see 11 CFR § 106.6 ④ attached) agreed to defer full payment of their professional fees and accept a minimum *monthly* payment until such time as campaign funding made full payment possible. My *minimum* monthly fee was set at \$5,000.00 per month *plus reimbursement of all expenses*. I began work as a member of the senior staff on the Alan Keyes for President '96, Inc. (AKP) campaign committee August 1, 1995.
5. On or near July 25, I called my creditors to notify them that I had accepted a new position with an initially underfunded grassroots presidential campaign. I requested and received reduced monthly payments (see table ⑤) and so lowered my *minimum* monthly professional fee to \$3,300 until such time as contributions and matching funds made payment in full possible as noted on the invoices.
6. No debt owed by the Committee to staff was reported before Jan 1996. In the January FEC report, my invoicing for the *minimum* due on my invoice was listed (see page 4 of "Debts and Obligations" ⑥) along with other Committee debt to staff listed for the first time.
7. Contrary to the NOTE (see ⑦) filed with the "New Debt" portion of the FEC report for March '96, Dave Racer refused to have Mary Lewis sign and submit the FEC report for March until the entry in "Debts and Obligations" for my full professional fees was removed. The addition of all other staff debt for full professional fees was made *including the addition of disputed invoices such as invoicing received by the Committee from contractors or vendors for work alleged but not authorized by the Committee*.

8. For the May FEC report, after further discussion and review of the FEC requirements, I entered all previously unlisted invoicing for full disclosure of the Committee's debt to senior staff including my own. The CPA and I completed the FEC report on June 19 since we would both be out of town on the 20th. The report was faxed to Dave Racer and a copy for signature and submission to the FEC was left at Quinn, Lynch & Lobel for Mary Parker Lewis' signature and her delivery of the report to the FEC on June 20. I did not receive my copy of the filed report until June 26, on my return from upgrading software and hardware for staff at our Emmitsburg office, at which time I discovered that Dave Racer had again insisted on the removal of only one line in the report, the inclusion of my full professional fee. The deletion of the entry on p. 7, and the alteration of totals on p. 13 and the summary page are conspicuous in the submitted report (see ③).
9. My work for the campaign required that I remain in 24 residence at the Alexandria office and included a minimum of 19 hours/day, 7 days a week, as well as alternating 24 hour phone duty with the Chief of Staff. It also included the loan and use of all my own technical equipment and resources. I:
- computerized bookkeeping and preparation of the accounts payable and disbursements for the quarterly and monthly FEC reports
 - programmed and customized forms and databases for FEC reporting
 - automated the daily AKP bank deposit and streamlined the caging process; delivered the daily AKP deposit to 1st Union Bank in Alexandria
 - automated the filing and tracking of campaign files and bank deposit records
 - filmed all of Dr. Keyes' Washington DC appearances
 - recorded all of Alan Keyes' broadcast speeches and interviews; this included correcting and properly programming all unfunctional electronic equipment including digital answering machines, VCRs, and cable currently installed in the office as well as overseeing the installation of an additional cable resource
 - served as NewMedia Contact for all alternative media Internet supporters, email correspondence, video releases, including major media press releases, contacts, and scheduling via the Internet
 - handled data entry, conversion and Internet transfers of the in-house database between Alexandria and SW Policy Group in AZ
 - submitted a proposal for the immediate software integration of a customized, low cost, fully computerized and scanned, in-house, data entry process to accelerate Matching Funds submissions, as well as maximize and improve submission accuracy; recommended an automated Bar Code filing system for deposits and campaign records
 - transcribed and posted to Internet Alan Keyes' speeches (Dr. Keyes gives all his speeches extempore); in November, transmission of my transcripts via email to Grant's email address provided George Grant with "new and diverse material" in the form of Dr. Keyes' recent speeches and enabled Grant to complete his contract with Zondervan Publishing which produced the book by Alan Keyes, ghosted by George Grant, *Our Character, Our Future*.
 - retrieved daily, opened, and sorted AKP mail from the Alexandria PO Box
 - prepared and delivered on a daily basis to UPS or Mailboxes Etc. in Alexandria all shipments (overnight and surface) from the Alexandria office
 - prepared and oversaw the photo duplication of all Matching Fund submissions and campaign file copies (up to 15,000 and more single document pages each submission)
 - organized and managed the manual alphabetization of all check photo copies of contributions received on two occasions which salvaged both the initial FEC Matching Fund Threshold qualification process (the FEC gave the campaign a single weekend to accomplish this task before simply disqualifying the Committee for any Matching Funds), and the May/June/July (Threshold/Non-threshold) submissions
 - prepared and shipped all files from the Alexandria office to St. Paul necessary to meet the Federal audit requirements in good order
 - analyzed, corrected and upgraded computer equipment, software, and workflow problems for the Correspondence Assistant at the Emmitsburg office; provided data entry, software and macro training
 - all ad hoc assignments as needed on a 24 hour basis

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EXHIBIT 11

980438933758

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-6680

FACSIMILE (202) 429-0102

November 19, 1996

VIA FACSIMILE

Roy A Wolfe, III, Esq.
9 North Court Square
Harrisonburg, VA 22801

Re: Kristin Kazyak, Case No. 59600930-RWK-7

Dear Mr. Wolfe:

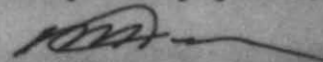
This letter is to advise you that Ms. Kazyak countered the generous offer made by the Committee which was communicated to you on October 28, 1996. That offer required her acceptance and her cooperation. She did not accept and she has not cooperated. For those reasons, the terms and conditions of the original offer conveyed to you on October 28, 1996 have not been satisfied.

In her counter of November 15, 1996, Ms. Kazyak made demands which are totally unacceptable to the Committee. She wants more money and she has imprudently threatened to retaliate against the Committee. If you want more details, you should contact Francis Chester, her attorney.

As it now appears, there will be no settlement unless the Committee's offer made by letter dated November 18, 1996 is accepted without condition by close of business November 22, 1996. In other words, if she does not accept this last offer, the creditors committee will not be able to settle her purported claim with the campaign.

Please call me if I can provide further explanation.

Very truly yours,


C. Michael Tarone

CMT: id
cc: David Racer
Mary Lewis

98043893759

11

EXHIBIT 12

9804389376C

BEFORE THE
FEDERAL ELECTION COMMISSION

Kristin R. Kazyak
128 West Main Street
Front Royal, Virginia 22630,

Complainant,

v.

Alan Keyes for President '96, Inc.
c/o David Racer
2515 White Bear Avenue
Suite 8A-301
St. Paul, Minnesota 55109,

Respondent.

MUR-4587

FEB 7 5 07 PM '97

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

NOTICE OF FILING

Attached hereto is **Exhibit 13** to the response of Alan Keyes
for President '96, Inc.

Respectfully submitted,


C. Michael Tarone
D.C. Bar No. 159228
The Federal Bar Building
1815 Pennsylvania Avenue, N.W.
Suite 906
Washington, D.C. 20006
(202) 457-6680

Counsel for
Alan Keyes for President
'96, Inc.

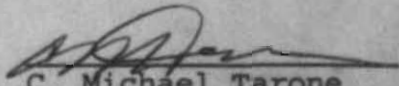
ORIGINAL

9804383761

CERTIFICATE OF SERVICE

I, C. Michael Tarone, hereby certify that a copy of the foregoing Notice of Filing regarding Exhibit 13 was served by hand on the 7th day of February 1997 with exhibits on the following individuals:

F. Andrew Turley, Esq.
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463


C. Michael Tarone

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EXHIBIT 13

980438933763

06/19/1996 20P25HDE812770451

DAVE RACER

NOTE

PAGE 01

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OK



Authorized and
paid for by Alan
Keyes for President
Committee

ALAN KEYES FOR PRESIDENT '96

FILE
Keyes
6/19/96

2515 White Bear Av, Ste 101 • St. Paul, MN • 55109 • (612) 777-1987 • FAX (612) 777-0881

Mark Skogerboe, Deputy Campaign Manager

Michael Tarone, Attorney

George Lynch, Accountant

Subject: Improper entry on Schedule D-P, June 20, 1996

From: Dave Racer, Campaign Manager *DR*

Page 7 of the Schedule D-P of the FEC report for the May reporting period, contains an entry for Kristin R Kazyak in the amount of \$78,100 shown as accrued during this period.

To my knowledge, I have never approved such an obligation of the committee and have never received documentation indicating that anyone else approved such an obligation. Until I receive a valid written claim from Ms. Kazyak, indicating the authorizing party for this obligation, I will not consider this a valid claim against the committee.

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13

C. MICHAEL TARONE

ATTORNEY AT LAW, P.C.

1815 H Street, N.W.
Washington, D.C. 20006

(202) 457-6680

FACSIMILE (202) 429-0102

November 15, 1996

VIA FACSIMILE
540-636-4127

Francis Chester, Esq.
11 East Second Street,
Front Royal, VA 22630

Re: Kristin Kazyak, Case No. 59600930-RWK-7

Dear Francis:

This letter follows our telephone conversation of today regarding Kristin Kazyak. I called you because I had not heard back from our previous telephone conversation wherein we discussed the proposal of Alan Keyes for President '96, Inc. ("AKP") to have her released from bankruptcy.

Under AKP's bankruptcy proposal, Kristin would be discharged from bankruptcy in exchange for AKP's payment to her creditors of \$31,000 and payment to her of \$6,000. Roy V. Wolfe, III, the trustee in bankruptcy accepted this proposal on behalf of the creditors committee. AKP's proposal required Kristin to accept, and to turn over documents and cooperate with AKP in the Federal Election Commission's routine audit of the committee.

It is my understanding that Kristin has rejected our proposal. Further, it is my understanding that Kristin's position is as follows: the campaign caused her to incur personal debts on her credit cards over a one-year period (she worked with the campaign for one year); the credit card debt is, according to her, the campaign's debt and not hers; she intends to withhold the computer codes in order to prevent the campaign from manipulating the data and other information; she will not turn over the documents and property of AKP and Mary Lewis; she is considering approaching the Federal Election Commission with information about the campaign which presumably would be unfavorable. Her counteroffer is to be released voluntarily from bankruptcy and in order to do so she wants the campaign to pay

12

Francis Chester, Esq.
November 15, 1996
Page -2-

her creditors in full, which is approximately \$60,000.

As of this date, the campaign has not received documentation to support payment to her of \$15,000 in expense reimbursement paid to her over the past year. It is AKP's position that because the documentation has not been forthcoming, the payment was income. You can understand our disbelief when hearing the assertion that Kristin's consumer credit card debts are campaign expenses. If you have documentation, please provide it.

Kristin now seeks \$60,000 more which will enable her to be voluntarily discharged from bankruptcy without unfavorable implications for invoking the bankruptcy laws in the first place.

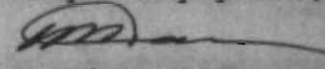
Secondly, the linkage of a \$60,000 payment to her unfavorable disclosures to the Federal Election Commission are totally unacceptable and improper. AKP will not take part in any such discussion or any such agreement. The campaign has consistently made truthful disclosures and operated within the lawful scope of the election laws. Any linkage she proposes is simply extortion.

It is interesting to note that two months ago Kristin told me that no pass words were placed on the computer in Alexandria. Her position has changed.

It is AKP's position that Kristin is a former campaign worker who has improperly removed documents and property of AKP and of Mary Lewis in breach of her fiduciary duty and her duty of loyalty. She now improperly asserts that her personal credit card debt was caused by and is the obligation of AKP. To this, she now adds that unless AKP cooperates, she will retaliate by going to the Federal Election Commission.

AKP rejects her counteroffer.

Very truly yours,


C. Michael Tarone

CMT: rs
cc: David Racer
Mary Parker Lewis

98043893766

C. MICHAEL TARONE

ATTORNEY AT LAW
(A PROFESSIONAL CORPORATION)

Federal Bar Building
1815 Pennsylvania Avenue N.W.
Suite 906
Washington, D.C. 20006

Telephone (202) 457-6680
Facsimile (202) 429-0102

May 30, 1997

VIA FACSIMILE
202-219-3923

Gregory R. Baker, Esq.
Special Assistant General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4587

Respondents: Alan Keyes for President '96, Inc.
c/o David G. Racer, Jr.

Dear Mr. Baker:

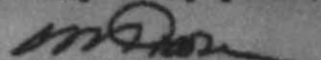
This is to confirm our telephone conversation of this afternoon wherein I requested a meeting at your earliest opportunity concerning MUR 4587.

There has been no activity in this matter since respondent's filing its response.

Please (i) confirm for me that this matter in fact been dormant since respondent's filing and (ii) advise me if a meeting will be granted.

Thank you for your cooperation in this matter.

Very truly yours,


C. Michael Tarone

cc: Mary Parker Lewis
David G. Racer, Jr.

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COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 30 4 17 PM '97

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 9, 1997

C. Michael Tarone, Esquire
Federal Bar Building
1815 Pennsylvania Avenue, N.W.
Suite 906
Washington, D.C. 20006

RE: MUR 4587
Alan Keyes for President '96, Inc.

Dear Mr. Tarone:

This is in response to your telephone call and letter of May 30, 1997, in which you requested information pertaining to the above-referenced complaint filed with the Federal Election Commission. This will confirm receipt of your client's response to the complaint.

As we discussed by telephone, the Commission has not made an initial determination regarding the allegations in the complaint, and any substantive contact—including a meeting—prior to such action would be premature. *See generally* 2 U.S.C. § 437g. We will notify you as soon as the Commission takes action on this matter.

Sincerely,

Gregory R. Baker
Special Assistant General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 2 4 30 PM '98

In the Matter of

Enforcement Priority System II

MUR 4587

SENSITIVE

GENERAL COUNSEL'S REPORT

I. INTRODUCTION

The case noted below has been identified as a "stale" matter under the Enforcement Priority System II ("EPS II") for cases assigned to OGC Public Financing, Ethics & Special Projects ("PFESP") staff. This report recommends that the Commission take no action and close the file in MUR 4587, Alan Keyes for President '96 Inc.

II. STALE CASE

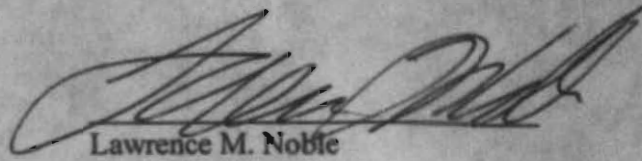
Investigations require greater resources of time and funds when the activity and factual evidence are not current. By focusing our investigative efforts on cases involving recent activity, we more efficiently allocate our limited resources where they can significantly affect the electoral process. As a result, under EPS II, approved September 10, 1996, cases assigned to the PFESP Docket as inactive matters are considered stale, and will be recommended for closing. See Memorandum to the Commission, PFESP Enforcement Priority System, dated August 6, 1996. Accordingly, this Office has identified one stale PFESP enforcement case that we believe does not warrant further investment of significant Commission resources. Therefore, this Office recommends that the Commission exercise its prosecutorial discretion and close the file in MUR 4587.

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III. RECOMMENDATION

1. Take no action, close the file, and approve the appropriate letter with respect to MUR 4587.

Date

6/2/98

Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Enforcement Priority System II.

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MUR 4587

CORRECTED CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 8, 1998, the Commission decided by a vote of 5-0 to take no action, close the file, and approve the appropriate letter with respect to MUR 4587, as recommended in the General Counsel's Report dated June 2, 1998.

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

Attest:

6-10-98

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., June 02, 1998 4:30 p.m.
Circulated to the Commission: Wed., June 03, 1998 11:00 a.m.
Deadline for vote: Mon., June 08, 1998 4:00 p.m.

lrd

98043893771



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kristin R. Kazyak
128 W Main Street
Front Royal, VA 22630

RE: MUR 4587

Dear Ms. Kazyak:

On November 25, 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 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 June 8, 1998. 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,

A handwritten signature in cursive script, appearing to read "Sheri Haynes", is written above the typed name.

Sheri Haynes
Paralegal Specialist

93043893772



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 11, 1998

Mary Parker Lewis, Treasurer
Alan Keyes for President '96 Committee
2515 White Bear Avenue
Suite 8A-301
St. Paul, MN 51109-5159

RE: MUR 4587

Dear Ms. Lewis:

On December 3, 1996, the Federal Election Commission notified Alan Keyes for President '96 Committee and Mary Parker Lewis, as Treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against the Alan Keyes for President '96 Committee and you, as treasurer. 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 the matter on June 8, 1998.

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 me at (800) 424-9530 or (202) 694-1650.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sheri Haynes", is written above the typed name.

Sheri Haynes
Paralegal Specialist

98043893773



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4581
DATE FILMED 7/10/98 CAMERA NO. _____
CAMERAMAN ESS

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