

**BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463**

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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UTAH STATE DEMOCRATIC COMMITTEE
455 South 300 East, Suite 102
Salt Lake City, UT 84111

Complainant,

v.

Merrill Cook
Merrill Cook for Congress Committee

Respondent,

ANSWER

MUR 4621

R.T. Nielson Company ("Nielson") responds to the Complaint in the above-referenced matter as follows:

1. The Complaint charges that the named respondents violated the Federal Election Campaign Act ("FECA") by failing to settle a disputed debt owed R.T. Nielson and failing to report said debt, resulting in respondents accepting impermissible loans or contributions.
2. No response.
3. The named respondents are Merrill Cook and Merrill Cook for Congress Committee. Nielson is not a named respondent.
4. Admitted upon information and belief.
- 5.. Admitted upon information and belief.
6. Denied. Nielson provided consulting and other services to the respondents with the expectation and agreement to be paid therefor. Respondents have failed to pay Nielson as agreed. Nielson denies providing said services as a loan or contribution to the named respondents. Indeed, it reported its concerns regarding the

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respondents' failure to pay Nielson and failure to properly report or treat said failure to the FEC to preclude any supposition that Nielson was in league with respondents in committing said apparent violations. (See, Ex. A)

7. Admitted.

8. Admitted.

9. Admitted that Nielson managed and consulted the respondents' congressional campaign. Denied that Nielson had any responsibility regarding respondents' compliance with FECA requirements.

10. Admitted upon information and belief.

11. Admitted upon information and belief that respondents have failed to properly report and treat their indebtedness to Nielson as required by FECA and that said failures may constitute a violation of FECA by respondents. Denied that said failures, being solely attributable to respondents' acts, errors, or omissions, constitute and illegal campaign loan or contribution or other FECA violation on the part of Nielson.

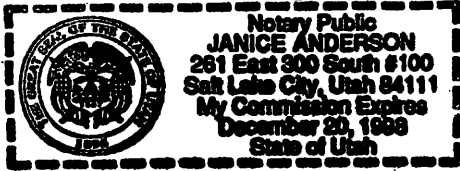
12. No response, except that any acts, errors, or omissions constituting a violation of FECA are solely attributable to respondents.

I, Ron T. Nielson , President of R.T. Nielson Company, being first duly sworn, affirm that the contents of this answer are true to the best of my knowledge.


Ron T. Nielson, President
R.T. Nielson Company

2008-04-05 2001

Subscribed and sworn to before me this 18th day of March, 1997.



Janice Anderson
Notary Public

DATED this 18 day of March, 1997.

RICHARDS, BRANDT, MILLER & NELSON

[Signature]
Craig C. Coburn
P. Keith Nelson
Attorneys for R.T. Nielson Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Answer was mailed, first-class, postage prepaid, on this 19 day of March, 1997, to the following:

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

[Signature]

144215

2002-504-40-12

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4621

NAME OF COUNSEL: Craig C. Coburn and P. Keith Nelson

FIRM: Richards, Brandt, Miller & Nelson

ADDRESS: 50 South Main Street, Seventh Floor

P.O. Box 2465

Salt Lake City, Utah 84110-2465

TELEPHONE: (801) 531-2000

FAX: (801) 532-5506

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

3/18/97
Date

Ronald T. Nielson
Signature

RESPONDENT'S NAME: R.T. Nielson

ADDRESS: P.O. Box 11481

Salt Lake City, Utah 84147

TELEPHONE: HOME (801)

BUSINESS (801) 359-1345

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4621

NAME OF COUNSEL: Scott N. Rasmussen and Todd D. Weiler

FIRM: Scalley & Reading, P.C.

ADDRESS: 261 East 300 South, Suite 200

Salt Lake City, Utah 84111

TELEPHONE: (801) 531-7870

FAX: (801) 531-7968

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

3/19/97

3/19/97

Date

Todd D. Weiler
Signature

RESPONDENT'S NAME: PHILLIPS, TWEDE & SPENCER, INC.

ADDRESS: 428 East 6400 South, Suite 230

Salt Lake City, Utah 84107

TELEPHONE: HOME () Not applicable

BUSINESS (801) 268-2828

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