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February 9, 1998

VIA MESSENGER

Tony Buckley, Esquire  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

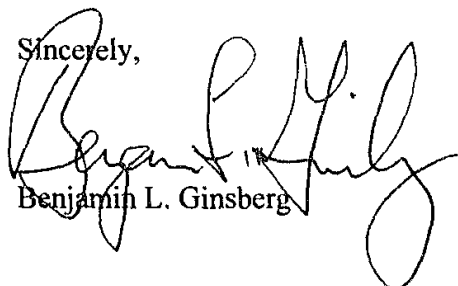
Re: MUR 4648 -- Responses of Jeffrey T. Buley and Luther Mook

Dear Mr. Buckley:

Enclosed please find the Responses to the Commission's Order to Submit Written Answers in the above-captioned matter on behalf of Jeffrey T. Buley and Luther Mook. The originals will be filed later this week.

Thank you for your attention. Please call me if you have an additional questions.

Sincerely,



Benjamin L. Ginsberg

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

New York Republican Federal Committee and  
Lewis B. Stone, as treasurer; Jeffrey T. Buley.

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)

MUR 4648

RESPONSE OF JEFFREY T. BULEY TO  
ORDER TO SUBMIT WRITTEN ANSWERS

GENERAL OBJECTIONS

The following general objections apply to each request for written answers (the "Questions") accompanying the FEC Subpoena:

1. I object to the Questions to the extent that they call for the disclosure of information and/or production of documents that are protected from discovery by the attorney-client privilege or work-product immunity or are otherwise privileged. To the extent that any privileged document is or may be produced in response to the Questions, the production of any such document is inadvertent and is not to be deemed a waiver of any privilege with respect to the produced document or any other document.
2. I object to the Questions to the extent they purport to impose obligations to supplement the disclosure of information and/or the production of documents beyond those imposed by the United States Code and the Federal Rules of Civil Procedure.
3. I undertake to disclose information and produce documents in response to the Questions only in the form, and to the extent, required by 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure. I object to each instruction, definition, question and request contained in the Questions to the extent that each instruction, definition, question and request attempts to impose obligations concerning the form

or context of document production beyond those required by such provisions or exceeds the scope of investigation permitted by, or conflicts with 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure.

4. I object to the Questions to the extent that they call for the disclosure of information or the production of documents containing proprietary information.

5. I reserve the right to modify the objections made herein or to assert additional objections to production as appropriate.

6. I reserve the right to modify, amend or supplement the answers to the Questions contained herein as further information becomes available or as otherwise appropriate.

Subject to the General Objections, and without waiving same, I hereby respond to the individual Questions as follows:

### **QUESTIONS**

**1. Identify the persons who signed checks issued by the Committee of \$15,000 each to you and David R. Dudley, of \$10,000 each to Mary F. Obwald and Gregory V. Serio, and of \$5,000 each to Luther Mook and the Kings County Republican Party, as reported on the Committee's 1994 30-Day Post-General Report.**

**Response:** George P. Scaringe, Assistant Treasurer of the New York Republican State Committee, signed all but two of the checks. William Powers, Chairman of the New York Republican State Committee, signed the \$5,000 check to Luther Mook and the check to the Kings County Republican Party.

**2. Regarding the \$50,000 in cash obtained by you through the negotiation of checks issued by the Committee on November 7, 1994 to you, Mary F. Obwald, Gregory V. Serio and David Dudley,**

**a) state the number of persons to whom you personally distributed any portion of that \$50,000;**

Response: One person.

**b) identify each person to whom you personally distributed any portion of that \$50,000 in amounts of \$100 or greater. Include in each identification the specific amount distributed, and the date and time of day and your location when the money was distributed; and**

Response: I gave all \$50,000 to William Powers in New York City on the day before the 1994 election. I do not recall the specific time of day or location.

**c) with respect to the persons identified in response to 2.b. above, identify each person to whom they personally distributed any portion of the above-specified money. Include in each identification the specific amount distributed.**

Response: I have no personal knowledge of to whom the money was ultimately distributed.

**3. Regarding the \$22,500 in cash obtained by you through the negotiation of checks issued by the Committee on October 31 and November 1, 1996 to you, Mary F. Obwald, J. Brendan Quinn, William D. Powers, Jason Powers, Kenneth Dippel, Lisa Herbst Ruggles, and Darryl Fox,**

**a) state the number of persons to whom you personally distributed any portion of that \$22,500;**

Response: One person.

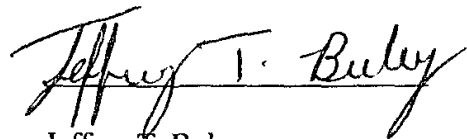
b) identify each person to whom you personally distributed any portion of that \$22,500 in amounts of \$100 or greater. Include in each identification the specific amount distributed, and the date and time of day and your location when the money was distributed; and

Response: I gave all \$22,500 to William Powers in New York City on the day before the 1996 election. I do not recall the specific time of day or location.

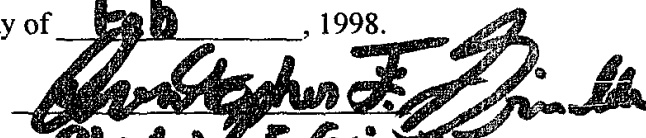
c) with respect to the persons identified in response to 3.b. above, identify each person to whom they personally distributed any portion of the above-specified money. Include in each identification the specific amount distributed.

Response: I have no personal knowledge to whom the money was ultimately distributed.

I swear that the proceeding statements are true to the best of my knowledge, information and belief.

  
Jeffrey T. Buley

SUBSCRIBED AND SWORN to before me this 9<sup>th</sup> day of Feb, 1998.

  
Christopher F. Grimaldi  
Notary Public

My Commission Expires: 4/22/98

02685051031  
Albany County

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 4648  
New York Republican Federal Committee and )  
Lewis B. Stone, as treasurer; Jeffrey T. Buley. )

RESPONSE OF LUTHER MOOK TO  
ORDER TO SUBMIT WRITTEN ANSWERS

**GENERAL OBJECTIONS**

The following general objections apply to each request for written answers (the "Questions") accompanying the FEC Subpoena:

1. I object to the Questions to the extent that they call for the disclosure of information and/or production of documents that are protected from discovery by the attorney-client privilege or work-product immunity or are otherwise privileged. To the extent that any privileged document is or may be produced in response to the Questions, the production of any such document is inadvertent and is not to be deemed a waiver of any privilege with respect to the produced document or any other document.
2. I object to the Questions to the extent they purport to impose obligations to supplement the disclosure of information and/or the production of documents beyond those imposed by the United States Code and the Federal Rules of Civil Procedure.
3. I undertake to disclose information and produce documents in response to the Questions only in the form, and to the extent, required by 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure. I object to each instruction, definition, question and request contained in the Questions to the extent that each

instruction, definition, question and request attempts to impose obligations concerning the form or context of document production beyond those required by such provisions or exceeds the scope of investigation permitted by, or conflicts with 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure.

4. I object to the Questions to the extent that they call for the disclosure of information or the production of documents containing proprietary information.

5. I reserve the right to modify the objections made herein or to assert additional objections to production as appropriate.

6. I reserve the right to modify, amend or supplement the answers to the Questions contained herein as further information becomes available or as otherwise appropriate.

Subject to the General Objections, and without waiving same, I hereby respond to the individual Questions as follows:

#### QUESTIONS

**1. Regarding the \$5,000 in cash obtained by you through the negotiation of a check issued by the Committee to you on November 5, 1994,**

**a) state the number of persons to whom you personally distributed any portion of that \$5,000;**

Response: I distributed the funds to approximately 55 persons but in no case did I distribute more than \$100 to any person pursuant to the instructions from Jeffrey T. Buley, Counsel to the New York Republican State Committee.

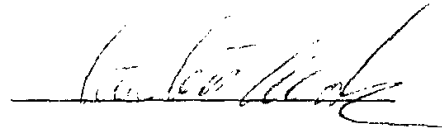
b) identify each person to whom you personally distributed any portion of that \$5,000 in amounts of \$100 or greater. Include in each identification the specific amount distributed, and the date and time of day and your location when the money was distributed; and

Response: I did not distribute more than \$100 to any one person.

c) with respect to the persons identified in response to 1.b. above, identify each person to whom they personally distributed any portion of the above-specified money. Include in each identification the specific amount distributed.

Response: I have no personal knowledge of any persons distributing any portion of this money.

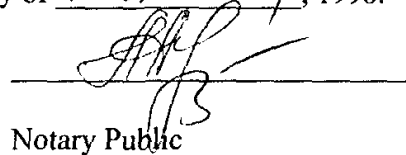
I swear that the proceeding statements are true to the best of my knowledge, information and belief.



Luther Mook

SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of February, 1998.

LARISA ALTSHULER  
Notary Public, State of New York  
Qualified in Kings County  
Reg. NO. 01AL5033466  
Commission Expires 9/19 98

  
Notary Public

My Commission Expires: