

Oct 31 1 35 PM '96

People For Truth
PO Box 5473
Washington, DC 20016-5473
(202) 298-0628

Office of General Counsel
Federal Election Commission
Washington, DC 20463

MUR 4558

Dear General Counsel:

Enclosed are three compliants filed against the Democratic National Committee, the Clinton-Gore Campaign and the Dole-Kemp Campaign alleging violations of the law. Appropriate statutory cites are provided.

It is requested that the Commission consider these as appropriate taking into consideration that Election Day is November 5, 1996. In addition, I am requesting an Advisory Opinion to determine if someone who is guilty of a crime before being elected President can later be determined to have been elected improperly.

I do sincerely hope that these matters can be resolved before Election Day.

Sincerely,

Mark Kleinman

Mark Kleinman

Mark Kleinman

District of Columbia:

Subscribed and sworn to before me this 31st day
of October, 1996.

Notary Public:

John B. [Signature]

My Commission Expires June 30, 1997

Compliant against Democratic National Committee

- cites
- 1) 2 USC 434(a)(2)(A)(i) --- failure to file required report
 - 2) 2 USC 434(b) --- failure to file appropriate information required by law
 - 3) 2 USC 441(a)(2)(C) --- excessive contribution to another political committee
-

2 USC 434(a)(2)(A)(i)

The report (the 12 Day Pre General) so far disclosed by the Democratic National Committee (DNC) discloses federal activity in excess of \$300,000. Attachments provided. This includes:

- A) expenditures to the Democratic Senatorial Campaign Committee and Democratic Congressional Campaign Committee totaling over \$300,000. These committees are solely organized for the purpose of electing federal candidates.
- B) expenditure to Congressman Cleo Fields of over \$1,300
- C) excessive contribution to Hollywood Women's Political Action Committee over \$17,000
- D) contributions to other political action committees which may be on the federal level including the Human Rights Campaign Fund
- E) transfers to over 100 party committees which may or may not be directly related to electing federal candidates

2 USC 434(b)

By virtue of this reporting requirement, the DNC has failed to provide the Summary and Detailed Summary Page, Debt Schedules, addresses for expenditures and other activity not yet disclosed.

2 USC 441(a)(2)(i)

The DNC discloses a contribution of over \$17,000 \$12,000 over the limit for multicandidate committees giving to other political action committees. (Note: Hollywood Women's PAC is C00188979)

ACCOUNTS PAYABLE CHECK HISTORY REPORT

Range: All Checks Written Against Cash Account 1020-000-00 To All Vendors From 10/01/96 To 10/16/96

Check No	Vendor# Name	Check-Date	Vouchr No	Po-No	Invoice No	Inv-Date	Amount Paid	Discount Taken	Check Amount
035546	DCCC	DEMOCRATIC CONGRESSIONAL 10/11/96	032539		101196	10/11/96	18,000.00	.00	18,000.00
					Check Totals:		18,000.00	.00	18,000.00
035547	WASH01	WASHINGTON DEMOCRATIC PARTY 10/11/96	032538		101196	10/11/96	4,045.69	.00	4,045.69
					Check Totals:		4,045.69	.00	4,045.69
035548	ALAS01	ALASKA DEMOCRATIC PARTY 10/11/96	032552		101096	10/11/96	482.00	.00	482.00
					Check Totals:		482.00	.00	482.00
035549	DAKOTA	NORTH DAKOTA DEMOCRATIC PARTY 10/11/96	032556		101196	10/11/96	750.00	.00	750.00
					Check Totals:		750.00	.00	750.00
035550	DELA02	DELAWARE DEMOCRATIC PARTY 10/11/96	032561		100396	10/11/96	250.00	.00	250.00
					Check Totals:		250.00	.00	250.00
035551	IDAH01	IDAHO DEMOCRATIC PARTY 10/11/96	032557		101196	10/11/96	1,075.00	.00	1,075.00
					Check Totals:		1,075.00	.00	1,075.00
035552	KENT01	KENTUCKY DEMOCRATIC PARTY 10/11/96	032563		101096	10/11/96	4,413.00	.00	4,413.00
					Check Totals:		4,413.00	.00	4,413.00
035553	MISS01	MISSISSIPPI DEMOCRATIC PARTY 10/11/96	032554		101196	10/11/96	669.00	.00	669.00
					Check Totals:		669.00	.00	669.00
035554	OKLA01	OKLAHOMA DEMOCRATIC PARTY 10/11/96	032569		101196	10/11/96	950.00	.00	950.00
					Check Totals:		950.00	.00	950.00
035555	PENN01	PENNSYLVANIA DEMOCRATIC PARTY 10/11/96	032570		101196	10/11/96	9,343.00	.00	9,343.00
					Check Totals:		9,343.00	.00	9,343.00
035556	WYOM01	WYOMING DEMOCRATIC PARTY 10/11/96	032566		101196	10/11/96	1,075.00	.00	1,075.00
					Check Totals:		1,075.00	.00	1,075.00
035557	KENT01	KENTUCKY DEMOCRATIC PARTY 10/11/96	032564		101196	10/11/96	105.00	.00	105.00
					Check Totals:		105.00	.00	105.00
035558	PENN01	PENNSYLVANIA DEMOCRATIC PARTY 10/11/96	032571		10/11/96	10/11/96	1,668.00	.00	1,668.00
					Check Totals:		1,668.00	.00	1,668.00

ACCOUNTS PAYABLE CHECK HISTORY REPORT

Page: All Checks Written Against Cash Account 1020-000-00 To All Vendors from 10/01/96 To 10/16/96

Check	Vendor#	Name Check-Date	Vouchr No	Po-No	Invoice No	Inv-Date	Amount Paid	Discount Taken	Check Amount
585	OH1001	OHIO DEMOCRATIC PARTY 10/15/96	032814		08/13/96	10/15/96	14,280.00	.00	14,280.00
					Check Totals:		14,280.00	.00	14,280.00
586	NEVA01	NEVADA DEMOCRATIC PARTY 10/15/96	032848		10/15/96	10/15/96	5,280.00	.00	5,280.00
					Check Totals:		5,280.00	.00	5,280.00
587	DSCC	DEMOCRATIC SENATORIAL CAMPAIGN 10/15/96	032862		10-15-96	10/15/96	50,000.00	.00	50,000.00
					Check Totals:		50,000.00	.00	50,000.00
588	FLOR01	FLORIDA DEMOCRATIC PARTY 10/15/96	032866		10-15-96	10/15/96	1,000.00	.00	1,000.00
					Check Totals:		1,000.00	.00	1,000.00
589	ILL101	ILLINOIS DEMOCRATIC PARTY 10/15/96	032869		101196	10/15/96	645.00	.00	645.00
					Check Totals:		645.00	.00	645.00
590	OREG01	OREGON DEMOCRATIC PARTY 10/15/96	032865		101596	10/15/96	3,000.00	.00	3,000.00
					Check Totals:		3,000.00	.00	3,000.00
591	FLOR01	FLORIDA DEMOCRATIC PARTY 10/15/96	032863		101596	10/15/96	330.00	.00	330.00
					Check Totals:		330.00	.00	330.00
592	TEXA01	TEXAS DEMOCRATIC PARTY 10/15/96	032868		10/11/96	10/15/96	1,976.00	.00	1,976.00
					Check Totals:		1,976.00	.00	1,976.00
593	DNCNFI	DNC NOM FEDERAL INDIVIDUAL 10/16/96	032894		101596	10/16/96	35,000.00	.00	35,000.00
					Check Totals:		35,000.00	.00	35,000.00
594	LIBERT	LIBERTY CITY L/G DEMOC. CLUB 10/16/96	032930		10/16/96	10/16/96	1,250.00	.00	1,250.00
					Check Totals:		1,250.00	.00	1,250.00
595	MASS01	MASSACHUSETTS DEMOCRATIC PARTY 10/16/96	032932		101696	10/16/96	5,035.00	.00	5,035.00
					Check Totals:		5,035.00	.00	5,035.00
596	DCDEMO	DC DEMOCRATIC PARTY 10/16/96	032936		101696	10/16/96	5,000.00	.00	5,000.00
					Check Totals:		5,000.00	.00	5,000.00
597	MICH01	MICHIGAN DEMOCRATIC PARTY 10/16/96	032935		10/16/96	10/16/96	6,762.00	.00	6,762.00
					Check Totals:		6,762.00	.00	6,762.00

ACCOUNTS PAYABLE CHECK HISTORY REPORT

Range: All Checks Written Against Cash Account 1230-000-00 To All Vendors From 10/01/96 To 10/16/96

Check No	Vendor# Name	Check-Date	Vouchr No	Po-No	Invoice No	Inv-Date	Amount Paid	Discount Taken	Check Amount	
001669 Manual	NCDP01 NORTH CAROLINA DEMOCRATIC	10/09/96	032329		100996	10/09/96	70,000.00	.00	70,000.00	
Check Totals:							70,000.00	.00	70,000.00	
001670 Manual	NCDP01 NORTH CAROLINA DEMOCRATIC	10/09/96	032330		10/09/96	10/09/96	30,000.00	.00	30,000.00	
Check Totals:							30,000.00	.00	30,000.00	
001671 Manual	NCDP01 NORTH CAROLINA DEMOCRATIC	10/15/96	032821		101496	10/15/96	11,500.00	.00	11,500.00	
Check Totals:							11,500.00	.00	11,500.00	
001672 Manual	NCDP01 NORTH CAROLINA DEMOCRATIC	10/15/96	032820		10/03/96	10/15/96	11,450.00	.00	11,450.00	
Check Totals:							11,450.00	.00	11,450.00	
001673 Manual	DSCC DEMOCRATIC SENATORIAL CAMPAIGN	10/15/96	032861		10/15/96	10/15/96	30,000.00	.00	30,000.00	
Check Totals:							30,000.00	.00	30,000.00	
0 Computer Checks							Cash Account Totals:	152,950.00		152,950.00
5 Manual Checks								.00		
5 Checks Total										

ACCOUNTS PAYABLE CHECK HISTORY REPORT

Range: All Checks Written Against Cash Account 1010-000-00 To All Vendors From 10/01/96 To 10/16/96

Check No	Vendor Name Check-Date	Vouchr No	Po-No	Invoice No	Inv-Date	Amount Paid	Discount Taken	Check Amount
024631	GLASS GLASS, TODD 10/02/96	031731		093096	10/02/96	90.00	.00	90.00
				Check Totals:		90.00	.00	90.00
024632	JONES JONES, LISA 10/02/96	031709		100296	10/02/96	15.31	.00	15.31
				Check Totals:		15.31	.00	15.31
024633	MARF01 MARFAIR JOINT VENTURE 10/02/96	031720		OCT 96	10/02/96	54,432.23	.00	54,432.23
				Check Totals:		54,432.23	.00	54,432.23
024634	MOOREM MOORE, MINYON 10/02/96	031736		090196	10/02/96	336.41	.00	336.41
				Check Totals:		336.41	.00	336.41
024635	SIEMER SIEMERT, JAKE 10/02/96	031735		093096	10/02/96	248.50	.00	248.50
				Check Totals:		248.50	.00	248.50
024636	WHITIN WHITING, R K 10/02/96	031730		091296	10/02/96	345.00	.00	345.00
				Check Totals:		345.00	.00	345.00
024638	DOUB04 DOUBLETREE HOTEL-SOMERSET 10/02/96	031340		001216	09/26/96	3,824.06	.00	3,824.06
				Check Totals:		3,824.06	.00	3,824.06
024639	FIELD1 CONGRESSMAN CLEC FIELDS 10/02/96	031739		093096	10/02/96	1,345.53	.00	1,345.53
				Check Totals:		1,345.53	.00	1,345.53
024640	WHITHS WHITE HOUSE STAFF MESS 10/02/96	031741		100296	10/02/96	405.01	.00	405.01
				Check Totals:		405.01	.00	405.01
024641	WILL03 WILLIAMS, DARRIN 10/02/96	031775 031774		09/23/96 09/23/96	10/02/96 10/02/96	78.55 56.21	.00 .00	78.55 56.21
				Check Totals:		134.76	.00	134.76
024642	WILLIS WILLIS, CAROL 10/02/96	031726 031727		090196 090596	10/02/96 10/02/96	2,324.94 557.19	.00 .00	2,324.94 557.19
				Check Totals:		2,882.13	.00	2,882.13
024644	WILLIS WILLIS, CAROL 10/02/96	031728 031725 031724		091096 10/02/96 100296	10/02/96 10/02/96 10/02/96	755.70 1,462.50 676.53	.00 .00 .00	755.70 1,462.50 676.53
				Check Totals:		2,894.73	.00	2,894.73

ACCOUNTS PAYABLE CHECK HISTORY REPORT

Range: All Checks Written Against Cash Account 1185-000-00 To All Vendors From 10/01/96 To 10/16/96

Check No	Vendor# Name Check-Date	Vouchr No	Po-No	Invoice No	Inv-Date	Amount Paid	Discount Taken	Check Amount
000346	HOMART HOMART PRESS 10/01/96	030039		081296	09/10/96	798.00	.00	798.00
				Check Totals:		798.00	.00	798.00
000347	BALLO3 BALLOON BOUQUETS 10/02/96	030882		12907	09/24/96	815.66	.00	815.66
				Check Totals:		815.66	.00	815.66
000348	CAVALI CAVALIER INVESTIGATIONS, INC. 10/02/96	031714		22764	10/02/96	433.00	.00	433.00
				Check Totals:		433.00	.00	433.00
000349	DNCCOR DNC NOM FEDERAL CORPORATE 10/03/96	031779		100396	10/03/96	23,326.45	.00	23,326.45
				Check Totals:		23,326.45	.00	23,326.45
000350	DNCFI DNC NOM FEDERAL INDIVIDUAL 10/03/96	031865		100396	10/03/96	60,000.00	.00	60,000.00
				Check Totals:		60,000.00	.00	60,000.00
000351	HOWARD HOWARD, ELAINE 10/03/96	031869 031868		09/24/96 092996	10/03/96 10/03/96	128.49 328.00	.00 .00	128.49 328.00
				Check Totals:		456.49	.00	456.49
000352	PHOTO1 PHOTO-UP 10/03/96	031866		16369	10/03/96	983.00	.00	983.00
				Check Totals:		983.00	.00	983.00
000353	PROJ01 PROJECTION VIDEO SERVICES, IN. 10/03/96	030884		0111	09/24/96	2,842.00	.00	2,842.00
				Check Totals:		2,842.00	.00	2,842.00
000354	THOM05 THOMANN, MARK 10/03/96	031867		093096	10/03/96	165.50	.00	165.50
				Check Totals:		165.50	.00	165.50
000355	HOLLO1 HOLLYWOOD WOMEN'S POLITICAL 10/03/96	031871		100396	10/03/96	17,702.96	.00	17,702.96
				Check Totals:		17,702.96	.00	17,702.96
000356	BURCH ROBERT BURCH 10/07/96	032131		100196	10/06/96	55.77	.00	55.77
				Check Totals:		55.77	.00	55.77
000357	DNCFI DNC NOM FEDERAL INDIVIDUAL 10/07/96	032216		100796	10/07/96	100,000.00	.00	100,000.00
				Check Totals:		100,000.00	.00	100,000.00
000358	GLENN GLENN, LARRY 10/07/96	032148		100196	10/07/96	810.00	.00	810.00

Complaint against Clinton-Gore General Campaign (Clinton)

cite: 26 USC 9012

The Clinton reports fails to disclose any payments to the Federal Government, as best as can be determined, for the use of Air Force One for political purposes. This constitutes a contribution received by Clinton which is in violation of the above mentioned cite. In addition, a further investigation may determine official misuse of Government property which may require a referral to the Department of Justice, including an Independent Counsel, as the Commission determines to be appropriate.

In addition, Pre-Mur 328 regarding the use of government property for political purposes may warrant a further review by the Commission to determine further action. Pre-Mur 328 involved allegations by the overseers of the Department of Interior filed with the Commission.

Finally, no reasonable person would not also call into question the reports in the media and through Congressional investigations that numerous individuals including Secretary Brown and possibly Secretary O'Leary, for example, misused government property and thus referral to the Department of Justice may be in order.

(Note the lack of evidence that the Clinton reports do not show expenditures for the use of Air Force One can be determined by reviewing all General Election reports filed by Clinton.)