

PATTON BOGGS, L.L.P.  
2550 M STREET, N.W.  
WASHINGTON, D.C. 20037-1350  
(202) 457-6000

FACSIMILE: (202) 457-6315

WRITER'S DIRECT DIAL

(202) 457-6405

July 13, 1998

F. Andrew Turley, Esquire  
Supervising Attorney  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 4758 -- New Republican Majority Fund and  
J. Stanley Huckaby, as treasurer

Dear Mr. Turley:

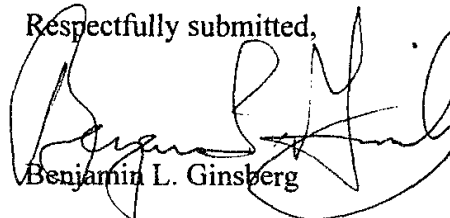
As counsel to the New Republican Majority Fund ("NRMF") and J. Stanley Huckaby, as treasurer, this will respond to the complaint filed in the above-captioned matter. Since it fails to state a violation of the Federal Election Campaign Act or the Regulations of the Federal Election Commission by the respondents, the complaint should be dismissed.

The complaint alleges a violation of 11 C.F.R. § 110.1(d) by the respondents, but this appears misplaced. Section 110.1(d) sets forth the \$5,000 per year contribution limit to a political committee such as NRMF. This cannot be a violation by respondents. The contribution at issue is a \$5,000 check bearing the names "C. Boyden Gray" and "Jeanne Fletcher". See Exhibit A. On its face, this is a permissible contribution since NRMF is a multicandidate committee and permitted to accept contributions from individuals up to \$5,000 per year. 11 C.F.R. § 110.1(d). Since Ms. Fletcher signed the check, NRMF correctly reported the contribution in her name.

Subsequent to reporting this contribution, NRMF received a letter from Mr. Gray stating that, in fact, the check in question constituted his "personal contribution." See Exhibit B. In accordance with that letter, NRMF filed an amendment to its April 20, 1997 report. See Exhibit C.

Accordingly, NRMF and J. Stanley Huckaby, as treasurer, have acted in accordance with the provisions of the Act and the Commission's Regulations. This complaint as to respondents should be dismissed.

Respectfully submitted,

  
Benjamin L. Ginsberg

C. BOYDEN GRAY  
JEANNE D. FLETCHER  
[REDACTED]

THE RIGGS NATIONAL BANK  
OF WASHINGTON, DC  
15-3/540

5335

February 21, 1997

Pay to the  
order of

New Republican Majority Fund

\$ 5,000.00

\*\*\*\*\*FIVE THOUSAND AND 00/100\*\*\*\*\* dollars

memo C. Boyden Gray Reservation 2/25/97 Reception  
[REDACTED]

*Jeanne D. Fletcher*

SECURITY FEATURES INCLUDED. DETAILS ON BACK.

C. BOYDEN GRAY/JEANNE D. FLETCHER/SPECIAL ACCOUNT

5335

February 21, 1997  
New Republican Majority Fund  
\$1,000.00  
Reception - 2/25/97

PLEASE DETACH THIS SECTION BEFORE MAILING.

C. BOYDEN GRAY/JEANNE D. FLETCHER/SPECIAL ACCOUNT

5335

C. BOYDEN GRAY  
1534 28th Street, N.W.  
Washington, D.C. 20007

February 6, 1998

Mr. John Green  
New Republican Majority Fund  
1301 Pennsylvania Avenue, N.W.  
Suite 500  
Washington, D.C. 20004

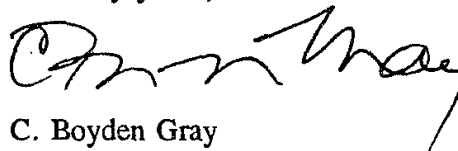
Dear Mr. Green:

It has come to my attention that my contribution of February 21, 1997 to the New Republican Majority Fund in the amount of \$5,000, has been filed with the Federal Election Commission listing my secretary, Jeanne D. Fletcher, as the contributor.

The purpose of this letter is to verify that my check #5335, signed by Jeanne D. Fletcher, is my personal contribution. A copy of the check and background paperwork is enclosed for your convenience.

I would appreciate it if you would file correction reports with the Federal Election Commission acknowledging me as the contributor as soon as possible.

Sincerely yours,



C. Boyden Gray

Enclosures

Approved and paid for by: NEW REPUBLICAN MAJORITY FUND, 1301 Pennsylvania Ave., N.W., Suite 500, Washington, D.C. 20004  
Contributions to NEW REPUBLICAN MAJORITY FUND are not deductible for Federal Income Tax Purposes

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 3 OF 6  
FOR LINE NUMBER 11 a i

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

**NAME OF COMMITTEE (in Full)**  
New Republican Majority Fund

<b>A. Full Name, Mailing Address and ZIP Code</b> C. Boyden Gray 1534 28th Street, N.W. Washington, DC 20007	<b>Name of Employer</b> Wilmer, Cutler & Pickering	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Attorney	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Frank Meeks 4752 Neptune Drive Alexandria, VA 22309	<b>Name of Employer</b> Dominos, Inc.	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Executive	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> William R. Pitts Jr. 4767 North 24th Road Arlington, VA 22207	<b>Name of Employer</b> ABC, Inc.	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Vice President	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Patrice R. Miller 1402 - 31st Street, N.W. Washington, DC 20007	<b>Name of Employer</b> Info Requested	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Info Requested	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Will Ehrle 5200 Backtrail Drive Austin, TX 78731-2603	<b>Name of Employer</b> Texas Manufactured Housing	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> CEO	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Sam Bamieh P.O. Box 1172 San Mateo, CA 94403	<b>Name of Employer</b> Self	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Investments	<b>Aggregate Year-to-Date</b> > \$ 5,000.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Michael A. Tongour 601 Pennsylvania Ave., N.W. Apt. 1404 Washington, DC 20004	<b>Name of Employer</b> Self	<b>Date (month, day, year)</b> 03/10/97	<b>Amount of Each Receipt this Period</b> 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b> Consultant	<b>Aggregate Year-to-Date</b> > \$ 500.00	

**SUBTOTAL of Receipts This Page (optional)** ..... 30,500.00

**TOTAL This Period (last page this line number only)** .....