



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**ADVANCE COPY BY FACSIMILE**

Robert P. Charrow, Esq.  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595

May 10, 2000

Re: MUR 4780  
Harris Corporation and  
Jeffrey Stanley

Dear Mr. Charrow:

This letter is in reference to the two telephone conversations you had with a representative of this Office, Anne Weissenborn, on May 4 - 5, 2000. In the initial conversation, Ms. Weissenborn called to inquire as to whether you had received a complete complaint notification package from this Office in the above mentioned matter. Specifically, you were asked whether you had received the second of two properly filed letters of complaint. You informed Ms. Weissenborn that you would have the file brought in from storage and check its contents. In the second conversation, you indicated to Ms. Weissenborn that the notification package was incomplete, that you had not realized that two different complaint letters were involved, and that you would like additional time in which to respond to any additional allegations and factual assertions.

This Office is granting your request for time in which to respond to any additional allegations and factual assertions raised in the complainant's second letter. Attached to this letter is a copy of the second letter of complaint that was omitted from the original notification package. Your response should be filed with this Office 10 days after the receipt of this letter.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Moye", is written over the typed name.

Jim Moye  
Law Clerk

Attachment  
Second letter of complaint

0096-104-40-02

Kimberly Blom

22813 Myrtle Drive • Eagle River, AK 99577

July 10th, 1998

Office of General Counsel  
Federal Election Commission  
Washington, DC 20463

RE: Government Contractor Election Law Violation

I would like to make the Federal Elections Commission, Office of General Counsel aware of the actions of one Program Manager for a government contractor. These actions include the solicitation of campaign funds for an individual candidate's political campaign as well as public endorsement of a political candidate by a government contractor. All accounts chronicled here are my own eye-witness accounts and are not based on hearsay or second-hand information.

Jeff Stanley, an employee for Harris Corporation, is the Program Manager for the ANICS project based in Anchorage, Alaska. ANICS is an Federal Aviation Administration (FAA) project and Harris Corporation is directly contracted by the FAA for this program. For a period of nine months I was a Technical Writer contracted to Harris Corporation on the ANICS project.

In the past several months there have been budgetary issues on the FAA side of the ANICS project that has jeopardized the continued existence of the ANICS project. As the end of May, 1998 approached, suddenly the funding problems cleared for the ANICS project. Jeff Stanley made it very clear this was due to his efforts in networking with various congressmen and senators. During the early part of May, shortly after the funding situation cleared, all employees of the ANICS project received invitations to a fund-raiser for one of the politicians named as being critical in clearing the budgetary picture. This fund-raiser was held at a beta-test facility for the Phase II aspect of the ANICS project. This facility reportedly was created utilizing only privately owned equipment, Harris and its subcontractors, and not utilizing any equipment already purchased by the FAA but not yet implemented into the system.

Throughout the week before the fund-raiser, continual pressure was repeatedly placed on the employees of the ANICS project to attend. This pressure was especially intense during the general, mandatory, staff meeting. The type of pressure that was applied insinuated that not attending this fund-raiser would reflect poorly on an individual and they could be perceived as not being a team player. This, as it has been stated by Jeff Stanley on many occasions - in no uncertain terms, was grounds for termination. On either Thursday or Friday, May 21st or 22nd, Jeff Stanley, during a general, mandatory, staff meeting, openly and clearly solicited for campaign donations to the politician at the fund-raiser the following Tuesday evening.

Due to outside obligations I was unable to attend the fund-raiser on Tuesday, May 26th. But Jeff Stanley reported in the general, mandatory, staff meeting the following day that several thousand dollars were raised for the politician the night before.

On Wednesday, May 27th, as well as on Friday, May 29th, during a general, mandatory, staff meeting, Jeff again clearly and openly solicited donations for this politician's campaign. During the solicitations he mentioned about all the effort on the part of the politician to keep ANICS funded. Thus insinuating that we owed this politician our jobs and should feel obligated to make a donation.

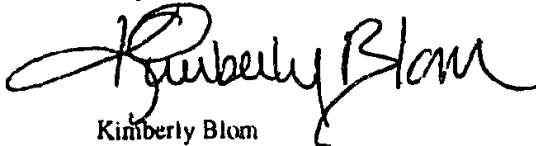
I am not a lawyer, nor am I completely versed in political fundraising rules and regulations. Having worked in the government contracting arena for several years I am fairly certain that open solicitation of funds for a political candidate as well as public endorsement of that candidate by a government contractor during a general staff meeting is against the rules and regulations that govern government contractors. The ANICS project does not have a Political Action Committee (PAC) where these endorsements and solicitations may be permissible.

During this account I have not mentioned the name of the political candidate for a specific reason. The politician for whom the solicitations were being made was not involved or present when these actions were taken by Jeff Stanley. Nor do I have any reason to believe that this candidate was aware of the actions of Jeff Stanley. If the FEC Office of General Counsel requires the name of the candidate I will provide it

I appreciate the Office of General Counsel's time concerning this complaint. I feel this kind of behavior on the part of a government contractor to be an issue that would concern the Federal Election Commission. On an attached sheet I have enclosed the pertinent address of those individuals that are involved. Please feel free to contact me at \_\_\_\_\_ (Alaska time, minus 4 hour hours from Eastern time) if you require any additional information.

Thank you again for your time.

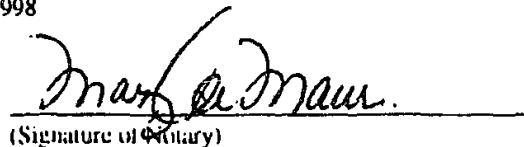
Respectfully,

  
Kimberly Blom

3rd Judicial District     )  
  ) ss.  
State of Alaska         )

On this day personally signed and sworn to before me Kimberly Ann Blom, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledge that she signed the same as her free and voluntary act and deed, for the uses and purposes therein mentioned. Given under my hand and official seal this 28 day of July, 1998



  
(Signature of Notary)

MARY ANN MAUREK  
(Printed Name of Notary)

Notary Public in and for the State of Alaska  
Resident at Anchorage  
My Commission Expires OCTOBER 27, 2001

## Parties Involved

### Supervisor to Respondent:

Ray Thorpe  
Harris Corporation  
Electronic Systems Sector  
P.O. Box 37  
Melbourne, FL 32902-0037

### Respondent:

Jeff Stanley  
Harris Corporation  
10441 VFW Drive  
Eagle River, AK 99577

### Complainant:

Kimberly Blom  
22813 Myrtle Drive  
Eagle River, AK 99577

6993:104:40:02