

The Conover Millar Group

August 12, 1998

The Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR 4792

Dear Sir or Madam,

I am writing today to file a formal complaint against the "Mueller For Congress Committee" in Illinois's Eleventh Congressional District. Mr. Mueller's June 30 FEC report contains false and inaccurate information.

To be more specific, Mr. Mueller claimed to have no debt, despite the fact that he owed our partnership, The Conover Millar Group, \$6,444.13 on that date. On March 31, 1998, Mr. Mueller's Campaign Manager, John Ruff, signed a contract for consulting services with Mr. Mueller's knowledge and on his behalf. We proceeded to incur expenses and provide the services outlined in the contract; at the start of June, Mr. Mueller and his campaign manager, Mr. Ruff, stopped returning phone calls from our organization. At no time have they acted to terminate the contract.

In addition to being reprehensible from a moral and political standpoint, Mr. Mueller has clearly violated federal election law by filing a false report with the Commission. We are planning further legal action against Mr. Mueller, Mr. Ruff and his campaign committee, but also ask you to reprimand him for non-compliance with FEC regulations.

I have included copies of all invoices sent to Mueller for Congress prior to June 30, 1998, a letter stating the current balance owed by Mueller for Congress, a "return receipt" form signed by a representative of Mueller for Congress and the legally binding contract signed by John Ruff, Campaign Manager for Mueller for Congress.

I hope this letter is sufficient for you to proceed with an investigation on the matters I have discussed.

Sincerely,


Don Millar

Subscribed and sworn to in my presence this

12th day of August, 1998

Notary Public, D.C.

My commission expires
Debra A. Cheek
Notary Public
District of Columbia
My Commission Expires:
August 14, 2001

Washington/Boston

904 Pennsylvania Avenue, S.E., Washington, D.C. USA 20003 Telephone: (202) 544-0585 • Fax: (202) 544-6876

The Conover Millar Group

22 July 1998

Mr. Gary Mueller
Mueller for Congress
302 West Maple Street
New Lenox, IL 60451

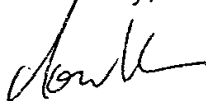
Dear Gary,

Having been unable to talk with you despite numerous phone calls to your office, I am writing to request that you remit full payment in the amount of \$9,464.55 to The Conover Millar Group for services rendered and expenses incurred on behalf of Mueller for Congress. As I'm sure you are aware, your account with us is seriously delinquent. According to the terms of our contract The Mueller for Congress Campaign owes us a professional fee of \$12,000, payable in installments of \$3,000 per month on the first day of May, June, July and August. As you know, this contract was agreed to with your signature.

I am enclosing copies of all of the invoices we have sent you to date in an attempt to receive payment for the work performed on your behalf. We would be happy to arrange a payment schedule with you, if you are unable to pay the full amount immediately.

In order to prevent turning this account over to our lawyers, we need to receive full payment from you by July 27th or have jointly agreed upon a payment plan with the first installment paid by July 27th. If we don't hear from you, we will be forced to submit this account to our attorneys.

Sincerely,



Don Millar
Partner

cc: Heather C. Conover, The Conover Millar Group
Jeanne S. Sklarz, The Conover Millar Group
Leonard Bonfanti, Ankeles, Harmon & Bonfanti

Washington/Boston

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CONTRACT

*Between The Gary Mueller For Congress Campaign
And The Conover Millar Group*

31 March 1998

This contract covers services to be provided in connection with the campaign to elect Gary Mueller to the United States House of Representatives from the 11th Congressional District of Illinois.

services

The Conover Millar Group ("CMG") agrees to provide the following services to the Gary Mueller for Congress Campaign ("The Campaign"):

- STRATEGIC PLANNING AND CONSULTATION: CMG will provide written and verbal consultation on all aspects of campaign strategy.
- ADVERTISING PRODUCTION: CMG will act as the exclusive agency in the production of all television and radio advertising.
- ADVERTISING PLACEMENT: CMG will be the sole and exclusive agency in the placement of television and radio advertising.
- WASHINGTON REPRESENTATION: CMG will work with the Campaign to build and maintain a positive profile in the Democratic political community in Washington, D.C.

*Mueller****Compensation***

The Campaign agrees to compensate CMG for these services in the following fashion:

- payment of a professional fee of \$12,000, payable in installments of \$3,000 per month on the first day of May, June, July and August.
- payment of the standard agency commission of 15% on the placement of all advertising up to \$300,000.
- payment of a reduced commission of 12% on the placement of advertising amounts between \$300,000 and \$400,000.
- payment of a reduced commission of 10% on the placement of advertising amounts in excess of \$400,000.

Production charges will be passed on to the Campaign by CMG without mark-up or commission.

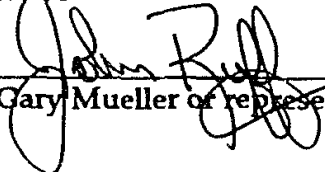
Expense Reimbursement

The Campaign agrees to pay, at cost and without mark-up, expenses associated with providing the services outlined in this contract. These include production, post-production, travel, long distance phone and fax, shipping charges, and food and accommodation in Illinois.

Confidentiality

The Campaign and CMG agree that all communication and recommendations, whether verbal or in writing, shall be considered confidential between the parties.

Signatures



Gary Mueller or representative

3/31/98

Date



Don Millar

3/31/98

Date



The Conover Millar Group

INVOICE

July 31, 1998

INVOICE: 980731-717

TERMS: Due Upon Receipt

For: Mueller For Congress

SERVICES

AMOUNT

Past Due Invoice #980610-717

\$ 9,444.13

CMG Retainer (August)

\$ 3,000.00

Telephone

\$ 7.50

TOTAL THIS INVOICE

\$ 12,451.63

Please make checks payable to "The Conover Millar Group."

Thank you.

Don Millar

Washington/Boston

904 Pennsylvania Avenue, S.E., Washington, D.C. USA 20003 Telephone: (202) 544-0585 • Fax: (202) 544-6876



The Conover Millar Group

INVOICE

May 29, 1998

INVOICE: 980529-717

TERMS: Due Monday, June 1, 1998

For: Mueller For Congress

SERVICES

AMOUNT

CMG Retainer (June
Phone

\$3,000.00
\$ 78.94

TOTAL THIS INVOICE

\$3,078.94

Please make check payable to "The Conover Millar Group".

Thank you

Don Millar

Washington/Boston

904 Pennsylvania Avenue, S.E., Washington, D.C. USA 20003 Telephone: (202) 544-0585 • Fax: (202) 544-6876

544-263-4060



The Conover Millar Group

INVOICE

April 21, 1998

INVOICE: 980421-706

TERMS: Due Friday, May 1, 1998

For: Mueller For Congress

SERVICES	AMOUNT
CMG Retainer (May)	\$3,000.00
Phone	\$50.79
Hotel	\$140.20
Food	\$18.20
Car Rental	\$132.00
Parking	\$24.00
TOTAL THIS INVOICE	\$3,365.19

Please make check payable to "The Conover Millar Group".

Thank you



Don Millar

Goto Page #

Next Page

Last Page

TO REPORT'S INDEX NEW SEARCH NEW ADVANCED SEARCH

REPORT OF RECEIPTS AND DISBURSEMENTSFor An Authorized Committee
(Summary Page)USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (IN FULL) GARY S. MUELLEN FOR CONGRESS		FEDERAL COMMITTEE for 70
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 1909 HARVARD LANE		
CITY, STATE and ZIP CODE NEW LENOX, IL 60451	STATE/DISTRICT 60451	
		2. FEC IDENTIFICATION 60033
		3. IS THIS REPORT AN <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report ☐ 12-Day Pre-Election Report for the _____ (Type _____)
election on _____ in the State of _____
- ☒ July 15 Quarterly Report ☐ 30-Day Post-Election Report following the General E
on _____ in the State of _____
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid-Year Report (Non-election Year Only) ☐ Termination Report

This report contains
activity for☐ Primary Election☒ General Election☐ Special Election**SUMMARY**

5. Covering Period	COLUMN A This Period
<u>4/1/98</u> through <u>6/30/98</u>	
6. Net Contributions (other than loans)	
(a) Total Contributions (other than loans) (from Line 11(e))	55,265.00
(b) Total Contribution Refunds (from Line 20(d))	
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	55,265.00
7. Net Operating Expenditures	
(a) Total Operating Expenditures (from Line 17)	29,512.10
(b) Total Offsets to Operating Expenditures (from Line 14)	
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	29,512.10
8. Cash on Hand at Close of Reporting Period (from Line 27)	47,722.38
9. Debts and Obligations Owed TO the Committee	

(Itemize all on Schedule C and/or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C and/or Schedule D)

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

McGee Cray

Signature of Treasurer



NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalty

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Goto Page #

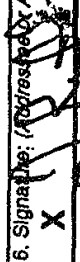
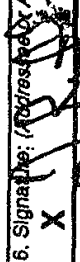
Next Page

Last Page

[TO REPORTS INDEX](#) [NEW SEARCH](#) [NEW ADVANCED SEARCH](#)

99 04 702 4669

is your RETURN ADDRESS completed on the reverse side?

SENDER: Complete items 1 and/or 2 for additional services. Print your name and address on the reverse of this form so that we can return this card to you. Attach this form to the front of the mailpiece, or on the back if space does not permit. Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Signature 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: GARY MUELLER MUELLER FOR CONGRESS 802 WEST MAPLE ST. NEW LENOX, IL. 60051		4a. Article Number 249494662	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
5. Received By: (Print Name) X 		7. Date of Delivery 7/24/98	
6. Signature: (Addressee or Agent) X 		8. Addressee's Address (Only if requested and fee is paid) 7/24/98	