

CHARLES G. MICHAELS

ATTORNEY AND COUNSELOR AT LAW
303 EAST 17TH AVENUE
SUITE 700
DENVER, COLORADO 80203

TELEPHONE (303) 837-0800

October 13, 1998

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

MUR 4827

RE: Complaint of Colorado Democratic Party - In re Campbell Victory Fund, Stuart D. Roy, Ben Nighthorse Campbell, and the National Republican Senatorial Committee

Dear Sir or Madam:

Enclosed are the original signed and notarized Complaint for the above-referenced matter and two copies of said Complaint for filing with the Federal Election Commission.

Very truly yours,


Charles G. Michaels

CGM/nas
Enclosures

FEDERAL ELECTIONS COMMISSION

In re CAMPBELL VICTORY FUND,
STUART D. ROY, BEN NIGHTHORSE
CAMPBELL, and the NATIONAL
REPUBLICAN SENATORIAL
COMMITTEE

MUR No. 4827

COMPLAINT

Between March 6, 1998 and the present, respondents the NATIONAL REPUBLICAN SENATORIAL COMMITTEE ("NRSC"), CAMPBELL VICTORY FUND, STUART D. ROY, and BEN NIGHTHORSE CAMPBELL (collectively "Respondents"), upon information and belief of the Colorado Democratic Party, conspired to violate and violated the Federal Elections Campaign Act.

RESPONDENTS

1. The CAMPBELL VICTORY FUND is the principal campaign committee of respondent Ben Nighthorse Campbell, a candidate for federal election in Colorado.
2. STUART D. ROY is an employee of the CAMPBELL VICTORY FUND.
3. BEN NIGHTHORSE CAMPBELL is a federal candidate for the United States Senate from Colorado.
4. The NATIONAL REPUBLICAN SENATORIAL COMMITTEE is a national political party committee.

FACTS

1. On or about March 6, 1998, Senator BEN NIGHTHORSE CAMPBELL hired STUART D. ROY to be employed by the CAMPBELL VICTORY FUND as campaign manager.
2. Beginning on or about March 6, 1998, STUART D. ROY began working for the CAMPBELL VICTORY FUND.
3. Starting on or about March 6, 1998, upon information and belief of the Colorado Democratic Party, STUART D. ROY's exclusive function at the CAMPBELL VICTORY FUND was to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal office.
4. Starting on or about March 6, 1998, STUART D. ROY began to take actions for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal office, including hiring additional staff for the CAMPBELL VICTORY FUND and making statements to the press regarding BEN NIGHTHORSE CAMPBELL'S advocacy.
5. According to the CAMPBELL VICTORY FUND's FEC disclosure reports (excerpt attached hereto as Exhibit A), on or about March 21, 1998, STUART D. ROY

was paid \$342 by the CAMPBELL VICTORY FUND. This disbursement is described as a "travel reimbursement."

6. According to the CAMPBELL VICTORY FUND's FEC disclosure reports (excerpt attached hereto as Exhibit B), on or about April 15, 1998, STUART D. ROY was paid \$5,000 by the CAMPBELL VICTORY FUND. This disbursement is described as a "consulting fee." The CAMPBELL VICTORY FUND's disclosure reports indicate that STUART D. ROY has been paid \$5,000 every two weeks since April 15, 1998.

7. Other than the reimbursement discussed in paragraph 5, the CAMPBELL VICTORY FUND's FEC reports do not indicate that any other disbursements were made to STUART D. ROY by the CAMPBELL VICTORY FUND prior to April 15, 1998.

8. Between March 6, 1998 and April 15, 1998, STUART D. ROY performed considerable services on behalf of the CAMPBELL VICTORY FUND to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal election. Selected news accounts of this activity as attached hereto as Exhibits G through L.

9. At no point between March 6, 1998 and April 15, 1998 did the CAMPBELL VICTORY FUND compensate STUART D. ROY for his services.

10. According to the NRSC's FEC report (excerpt attached hereto at Exhibit C), the NRSC disbursed \$1,408.43 to STUART D. ROY on March 13, 1998 (hereinafter "March 13 disbursement") – approximately one week after STUART D. ROY had been hired by the CAMPBELL VICTORY FUND.

11. The NRSC's FEC report (excerpt attached hereto as Exhibit C) indicates that the March 13, 1998 disbursement included \$492.95 in non-federal funds. The March 13, 1998 disbursement also included \$915.48 in federal funds.

12. At the time of the March 13, 1998 disbursement, STUART D. ROY was working exclusively for the CAMPBELL VICTORY FUND to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal election.

13. According to the NRSC's FEC report (excerpt attached hereto as Exhibit D), the NRSC disbursed \$1,408.43 to STUART D. ROY on March 31, 1998 (hereinafter "March 31 disbursement") – approximately three weeks after STUART D. ROY had been hired by the CAMPBELL VICTORY FUND.

14. The NRSC's FED report (excerpt attached hereto as Exhibit D) indicates that the March 31 disbursement included \$492.95 in non-federal funds. The March 31 disbursement also included \$915.48 in federal funds.

15. At the time of the March 31 disbursement, STUART D. ROY was, upon information and belief, working exclusively for the CAMPBELL VICTORY FUND to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal election.

COUNT ONE: FAILURE TO REPORT RECEIPT OF IN-KIND CONTRIBUTION

16. The CAMPBELL VICTORY FUND did not compensate STUART D. ROY for his "consulting" services from March 6 to April 15, 1998.

17. At his customary rates, STUART D. ROY charges \$10,000 per month for his consulting services.

18. The CAMPBELL VICTORY FUND received over \$10,000 in election-related services from STUART D. ROY without compensating him.

19. The services provided by STUART D. ROY to the CAMPBELL VICTORY FUND from March 6, 1998 to April 15, 1998 constitute an in-kind contribution to the CAMPBELL VICTORY FUND.

20. The CAMPBELL VICTORY FUND failed to disclose the in-kind contribution of STUART D. ROY's services.

21. The CAMPBELL VICTORY FUND's failure to disclose the in-kind contribution of STUART D. ROY's services violates the Federal Elections Campaign Act.

COUNT TWO: FAILURE TO DISCLOSE CONTRIBUTION

22. The NRSC paid STUART D. ROY over \$3,000 between March 6, 1998 and April 15, 1998.

23. At the time of the March 13 and March 31 disbursements, STUART D. ROY was an employee of the CAMPBELL VICTORY FUND.

24. In the period between March 6, 1998 and April 15, 1998, STUART D. ROY performed over \$10,000 worth of services (at his customary rates) for the CAMPBELL VICTORY FUND.

25. The March 13 and March 31 disbursements constitute a direct subsidy by the NRSC of the CAMPBELL VICTORY FUND's ordinary campaign expenses. The NRSC defrayed the obligations of the CAMPBELL VICTORY FUND to compensate its employees.

26. The NRSC failed to disclose payments made to employees of the CAMPBELL VICTORY FUND as a disbursement to the CAMPBELL VICTORY FUND.

27. The NRSC's failure to disclose the disbursement of payments to employees of the CAMPBELL VICTORY FUND violates the Federal Elections Campaign Act.

COUNT THREE: ILLEGAL USE OF NON-FEDERAL FUNDS

28. Between March 6, 1998 and April 15, 1998, the NRSC disbursed almost \$1,000 in non-federal funds to STUART D. ROY, an employee of the CAMPBELL VICTORY FUND.

29. Between March 6, 1998 and April 15, 1998, upon information and belief of the Colorado Democratic Party, STUART D. ROY's exclusive function was to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal office.

30. Between March 6, 1998 and April 15, 1998, STUART D. ROY and/or the CAMPBELL VICTORY FUND used the \$1,000 non-federal contribution from the NRSC to expressly advocate on behalf of BEN NIGHTHORSE CAMPBELL, a candidate for federal office.

31. The use of a non-federal contribution by STUART D. ROY and/or the CAMPBELL VICTORY FUND to advocate on behalf of a candidate for federal office constitutes a violation of the Federal Elections Campaign Act.

COUNT FOUR: ILLEGAL DISBURSEMENT OF NON-FEDERAL FUNDS

32. Between March 6, 1998 and April 15, 1998, the NRSC disbursed almost \$1,000 in non-federal funds to STUART D. ROY, an employee of the CAMPBELL VICTORY FUND.

33. Between March 6, 1998 and April 15, 1998, upon information and belief of the Colorado Democratic Party, STUART D. ROY's exclusive function was to advocate for the election of BEN NIGHTHORSE CAMPBELL, a candidate for federal office.

34. Between March 6, 1998 and April 15, 1998, STUART D. ROY and/or the CAMPBELL VICTORY FUND used the \$1,000 non-federal contribution from the NRSC to expressly advocate on behalf of BEN NIGHTHORSE CAMPBELL, a candidate for federal office.

35. The NRSC's disbursement of non-federal funds to STUART D. ROY and/or the CAMPBELL VICTORY FUND facilitated their advocacy on behalf of a candidate for federal office.

36. The contribution of non-federal funds by the NRSC to STUART D. ROY and/or the CAMPBELL VICTORY FUND to be used in a federal election constitutes a violation of the Federal Election Campaign Act.

COUNT FIVE: VIOLATION OF NATIONAL PARTY COMMITTEE CONTRIBUTION LIMIT

37. On June 30, 1997, the NRSC disbursed \$17,500 to the CAMPBELL VICTORY FUND. The relevant portion of the CAMPBELL VICTORY FUND's FEC report has been attached hereto as Exhibit E.

38. On March 13, 1998, the NRSC disbursed \$1,408.43 to STUART D. ROY, a full-time employee of the CAMPBELL VICTORY FUND.

39. On March 31, 1998, the NRSC disbursed \$1,408.43 to STUART D. ROY, a full-time employee of the CAMPBELL VICTORY FUND.

40. On July 31, 1998, the NRSC expended \$10,102.51 in postage expenses on behalf of BEN NIGHTHORSE CAMPBELL. The relevant portion of the NRSC's FEC report has been attached hereto as Exhibit F.

41. The transactions identified in paragraphs 37 through 40 exceed the contribution limit for a national party to a candidate for federal election, in violation of the Federal Election Campaign Act.

COUNT SIX: ILLEGAL RECEIPT OF CONTRIBUTION IN EXCESS OF CONTRIBUTION LIMIT

42. On June 30, 1997, the CAMPBELL VICTORY FUND received \$17,500 from the NRSC. The relevant portion of the CAMPBELL VICTORY FUND's FEC report has been attached hereto as Exhibit E.

43. On March 13, 1998, the CAMPBELL VICTORY FUND, by its agent and employee STUART D. ROY received \$1,408.43 from the NRSC.

44. On March 31, 1998, the CAMPBELL VICTORY FUND, by its agent and employee STUART D. ROY received \$1,408.43 from the NRSC

45. On July 31, 1998, the CAMPBELL VICTORY FUND received \$10,102.51 in an in-kind postage expense from the NRSC. The relevant portion of the NRSC's FEC report has been attached hereto as Exhibit F.

46. The transactions identified in paragraphs 42 through 45 exceed the contribution limit for a principal campaign committee to receive from a national party committee, in violation of the Federal Election Campaign Act

**COUNT SEVEN: CONSPIRACY TO VIOLATE THE
FEDERAL ELECTION CAMPAIGN ACT**

47. The allegations of paragraphs 1 through 46 are incorporated herein by reference.

48. On or about March 6, 1998, respondents STUART D. ROY, BEN NIGHTHORSE CAMPBELL, the CAMPBELL VICTORY FUND, and the NRSC agreed to violate the Federal Election Campaign Act. This conspiracy included an agreement:

- For the NRSC to illegally subsidize the CAMPBELL VICTORY FUND payroll;
- For the NRSC to illegally funnel non-federal funds to be used for political activity in a federal election;
- For the CAMPBELL VICTORY FUND to illegally use non-federal funds to fund political activity in a federal election;
- For the NRSC and the CAMPBELL VICTORY to exceed the national party contribution limit to a principal campaign committee;
- For the NRSC and the CAMPBELL VICTORY FUND to violate the reporting obligations of the Federal Election Campaign Act.

Respectfully submitted,

COLORADO DEMOCRATIC PARTY

By: Charles G. Michaels
Charles G. Michaels, Esq., General Counsel
303 East 17th Avenue, Suite 700
Denver, Colorado 80203
(303) 837-0800

Exhibits Attached

Subscribed and sworn to
before me this 13 day
of October, 1998.

Phil J. Banta
Notary Public

My Commission Expires 5-5-2002

SCHEDULE B

ITEMIZED DISBURSEMENTS

EXHIBIT A

Use this Schedule (a) for category of the Data Summary Page	PAGE 17 OF 19
FOR LINE NUMBER 17	

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)
Campbell Victory Fund

Full Name, Mailing Address and Zip Code Public Service Co PO Box 840 Denver, CO 80201-	Purpose of Disbursement Utilities Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 02/09/98	Amount of Each Disbursement This Period \$322.01
Full Name, Mailing Address and Zip Code QuickInfo Corp 3005 Winterwood Ave Albany, GA 31707-4523	Purpose of Disbursement Software Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 01/06/98	Amount of Each Disbursement This Period \$150.00
Full Name, Mailing Address and Zip Code Roll International 11444 W Olympic Blvd. Los Angeles, CA 90064-	Purpose of Disbursement Entertainment Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 01/29/98	Amount of Each Disbursement This Period \$426.44
Full Name, Mailing Address and Zip Code Stuart Roy 4500 South Monaco St. Apt. 816 Denver, CO 80237-	Purpose of Disbursement Travel Reimbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 03/21/98	Amount of Each Disbursement This Period \$342.00
Full Name, Mailing Address and Zip Code Tom Shipps 835 E. 2nd Avenue Ste 123 Durango, CO 81301-	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 03/25/98	Amount of Each Disbursement This Period \$500.00 IN KIND
Full Name, Mailing Address and Zip Code State Farm Insurance 3001 8th Avenue Greeley, CO 80638-0001	Purpose of Disbursement Insurance Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 01/29/98	Amount of Each Disbursement This Period \$208.00
Full Name, Mailing Address and Zip Code Suburban Copy 336 S. Chambers Aurora, CO 80017-	Purpose of Disbursement Equipment Lease Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 01/13/98	Amount of Each Disbursement This Period \$2799.41

SUBTOTAL of Disbursements This Page (optional)

\$4747.86

TOTAL This Period (last page this line number only)

980200739604

TOTAL This Period (last page this line number only)

DISBURSEMENT SCHEDULE H4

(effective 1/1/91)

JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

Page	of
50	86
FOR LINE 21A	

NAME OF COMMITTEE: NATIONAL REPUBLICAN SENATORIAL COMMITTEE

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
William B. Wykpiet 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$664.91	\$432.19	\$232.72

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,696,731.33

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Michael L. Russell 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$2,474.92	\$1,608.70	\$866.22

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,699,206.25

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Kathryn L. Harrison 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$1,049.03	\$681.22	\$366.81

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,700,254.28

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Christopher J. Maiorana 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$723.84	\$470.50	\$253.34

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,700,978.12

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Stuart D. Roy 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$1,408.43	\$915.48	\$492.95

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,702,386.55

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Amy F. Bradley 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/13/98	\$1,427.13	\$927.63	\$499.50

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$1,703,813.68

SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE

\$7,747.26

\$5,035.72

\$2,711.54

EXHIBIT C

95020102465

DISBURSEMENT SCHEDULE H4
(effective 1/1/91)JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

Page	of
79	86
FOR LINE 21A	

NAME OF COMMITTEE: NATIONAL REPUBLICAN SENATORIAL COMMITTEE

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Stuart D. Roy 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$1,408.43	\$915.48	\$492.95

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,158,177.65

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Amy F. Bradley 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$1,427.13	\$927.63	\$499.50

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,159,604.78

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
David D. Hansen 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$2,706.28	\$1,759.08	\$947.20

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,162,311.06

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Sally M. Abraham 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$972.32	\$567.01	\$305.31

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,163,183.38

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Matthew Lowe 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$1,081.78	\$703.16	\$378.62

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,164,265.16

FULL NAME, ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Sean L. Yeakle 425 Second Street, NE Washington, DC 20002	Salary Z7FN	3/31/98	\$1,014.83	\$659.64	\$355.19

CATEGORY: Administrative

EVENT YEAR-TO-DATE: \$2,165,279.99

SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE

\$8,510.77

\$5,532.00

\$2,978.77

EXHIBIT D

PAGE 1 OF
FOR LINE NUMBER 11(b)

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

Full Name	Name of Employer	Date	Amount
Mailing Address	Occupation	MM/DD/YY	
National Republican Senatorial Comm.		06/30/97	\$17500.00
PO Box 75103			
Washington, DC 20013-5103			
Receipt for <input checked="" type="checkbox"/> Primary	Aggregate YTD >		\$17500.00
SUBTOTAL of Receipts This Page.....>			\$17500.00
TOTAL This Period.....>			\$17500.00

EXHIBIT E

be used only by Political Committees in the General Election

Name of Political Committee (in Full)				
NATIONAL REPUBLICAN SENATORIAL COMMITTEE				
Has your Committee been designated to make coordinated expenditures by a political committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Republican National Committee 310 First St, SE Washington, DC 20003				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
U.S. Postmaster Lincoln, NE 68501	Senator Ben Nighthorse Campbell U.S. Senate Colorado	Postage Expense	7/31/98	10,102.51
Aggregate General Election Expenditure for this Candidate - \$ 10,102.51				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate - \$				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate - \$				
SUBTOTAL of Expenditures This Page (optional)				10,102.51
TOTAL This Period (last page this line number only)				10,102.51

EXHIBIT F

7802031825950003

LEVEL 1 - 86 OF 365 STORIES

Copyright 1998 Denver Publishing Company
The Rocky Mountain News (Denver, Co.)

March 7, 1998, Saturday,

SECTION: LOCAL; Ed. F; Pg. 34A

LENGTH: 277 words

HEADLINE: CAMPBELL NAMES HEAD OF CAMPAIGN

BYLINE: Peter Blake; Rocky Mountain News Columnist

BODY:

Sen. Ben Nighthorse Campbell has named Stuart Roy, the 30-year-old press secretary for the National Republican Senatorial Committee, as his new campaign manager. He succeeds veteran activist Steve Durham, who resigned in a surprise move last weekend.

Durham said he wanted to devote more time to his lobbying business at the statehouse, which he continued to pursue while running the campaign. Campbell was unavailable for comment, but his son Colin said he expected the committee
The Rocky Mountain News (Denver, Co.) , March 7, 1998

to lend other staffers to the senator as well. Roy said he was going to "start with a clean slate" when it came to the campaign staff, but he may not have had a choice. Four staffers who had worked for Durham all resigned by Friday: deputy manager Karen Herber; finance director Gray Behrhorst; deputy finance director Jill Matchinsky; and organizational director Bill Groffy. Roy also said he had "let go" Eddie Mahe, whose Washington firm had been Campbell's general consultant. Roy said he had hired a new Washington fund-raiser to replace the one who left, but declined to identify him or her. Roy, who's been based in Washington, will start work in Colorado Tuesday. Two staffers from Campbell's Senate office will move over to join him on the campaign: Carolyn Last and Scottie Greagg. This will be the first campaign Roy has managed, although he has been active in four previous federal campaigns. Roy's first chore will be shoring up Campbell's support in the April 7 caucuses. He faces a possible primary challenge from Denver lawyer Bill Eggert, who is little known statewide but is expected to get strong support from the anti-abortion wing of the GOP.

LANGUAGE: ENGLISH

Copyright 1998 The Denver Post Corporation
The Denver Post

March 10, 1998 Tuesday 2D EDITION

SECTION: DENVER & THE WEST; Pg. B-01

LENGTH: 446 words

HEADLINE: Campbell hires new manager

BYLINE: By Adriel Bettelheim, Denver Post Washington Bureau

BODY:

WASHINGTON - Facing the unexpected departure of five key staffers of his re-election campaign, Sen. Ben Nighthorse Campbell, R-Colo., is turning to a Washington political publicist to be his new campaign manager.

Stuart Roy, deputy communications director at the Republican Senatorial Campaign Committee, is scheduled to take over Campbell's campaign today following the departures in the past 10 days of ex-campaign manager Steve Durham and four of his deputies.

The Denver Post, March 10, 1998 Tuesday

Since July, Roy has served as a liaison between Campbell and the campaign committee, the national fund-raising apparatus for Republican Senate candidates. This will be the first time Roy directs a statewide political campaign.

"The campaign is basically in good shape, all the fundamentals are in place, and what we need to do is keep blocking and tackling," Roy said Monday. "I want to come in with a clean slate."

That was assured after four key campaign staffers hired by Durham quit the Campbell campaign Friday. The group included deputy campaign manager Karen Herber, finance director Gray Behrhorst and organizational director Bill Groffe.

In addition, Eddie Mahe, a powerful Beltway GOP political consultant who was working with Durham on general campaign strategy, was told his contract would not be renewed.

Durham quit 10 days ago, saying he wanted to devote more time to his political consulting business.

Before joining the Republican senatorial committee, Roy served as press secretary to Jan Stoney, the Republican candidate who lost the 1994 Nebraska U.S. Senate race to Democrat Bob Kerrey.

The Denver Post, March 10, 1998 Tuesday

Roy said he hoped to have a new campaign staff in place by the end of this week.

Democrats cited the continued departures as evidence of turmoil within Campbell's camp and said the Republican senatorial committee had to come to Campbell's rescue by dispatching Roy.

"Aside from the fact he has no one to raise money, organize his campaign operation or plan strategy, Sen. Campbell is in great shape," said Michael

Tucker, spokesman for the Democratic Senatorial Campaign Committee. "The Titanic had more survivors than the Campbell campaign." But Roy said Democrats were exaggerating in the hope of boosting the fortunes of their own candidates, former Colorado first lady Dottie Lamm and state Rep. Gil Romero of Pueblo.

Campbell continues to maintain a fund-raising edge over Lamm, reporting \$ 774,878 of cash on hand at year's end.

Lamm reported \$ 165,825 of cash available at year's end but reported outraising Campbell in individual contributions during the second half of 1997. Romero had not raised enough money by year's end to be required to file a contribution report.

The Denver Post, March 10, 1998 Tuesday

LOAD-DATE: March 10, 1998

EXHIBIT I

LEVEL 1 - 81 OF 365 STORIES

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The Hill

<=1> View Related Topics

March 11, 1998

SECTION: STATE BY STATE; Pg. 16

LENGTH: 260 words

HEADLINE: COLORADO MATH: CAMPBELL ADDS AND SUBTRACTS

BODY:

Sen. Ben Nighthorse Campbell (R-Colo.) named National Republican Senatorial Committee (NRSC) Press Secretary Stuart Roy his new campaign manager Monday.

The announcement came on the heels of campaign upheaval last week when Steve Durham, the previous campaign manager, and several other top staffers resigned.

"I think it's going to be a good race, I think Sen. Campbell is in a great position for reelection," said Roy. Noting that Campbell's challenger is
Capitol Hill Publishing Corp., March 11, 1998

likely to be Dottie Lamm, he added, "I think Sen. Campbell matches up very well with Dottie both on issues and personality."

In the wake of Durham's resignation, four other staffers, Deputy Manager Karen Herber, Finance Director Gary Behrhorst, Deputy Finance Director Jill Matchinsky and Organizational Director Bill Groffy resigned last Friday. One of Roy's first moves as campaign manager was to fire General Consultant Eddie Mahe.

Roy, who is due in Colorado this week, downplayed the effect of the shakeup, pointing out that the campaign was established in all but seven of Colorado's 63 counties.

"We probably lost four days," Roy said. "(Durham) left Friday, I'm coming on board now. Other than that, we're going to hit the ground running. ... Obviously you don't want to change your leadership, but you want to do it in February or March rather than in September."

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Capitol Hill Publishing Corp., March 11, 1998

Robert Schlesinger

LANGUAGE: English

LOAD-DATE: March 11, 1998

EXHIBIT J

LEVEL 1 - 80 OF 365 STORIES

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Roll Call

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March 12, 1998

SECTION: shop talk

LENGTH: 510 words

BYLINE: By Amy Keller

BODY:

Changing Horses. Party-switching Colorado Sen. Ben Nighthorse Campbell's (R) campaign suffered one severe setback after another last week, when campaign manager Steve Durham quit and several other aides followed him to the exits.

Campbell campaign officials said Durham wanted to concentrate on his lobbying career full time, but four other campaign staffers left with him: deputy manager Karen Herber, finance director Gray Behrhorst, deputy finance director Jill Matchinsky, and organizational director Bill Groffy.

Roll Call March 12, 1998

But in every cycle there is at least one major campaign that struggles and is "adopted" by the party committees, and help from Washington was soon on the way.

National Republican Senatorial

Committee press secretary Stuart Roy was quickly dispatched to the scene to pick up the pieces. Roy was the press

secretary for Republican candidate Jan Stoney's failed Senate run in Nebraska in 1994 and played the same role in Guy Millner's (R) unsuccessful Senate campaign in Georgia in 1996.

In addition to hiring a new DC-based fundraiser - whom he would not identify - Roy "let go" DC-based general consultant Eddie Mahe. To shore up the operation, Campbell Senate staffers Carolyn Last and Scotland Gragg will be joining the campaign.

Democrats were quick to portray the shakeup as a panicked response by a faltering campaign.

"Stuart was a top aide to one of the only Republican campaigns in 1994 that didn't win, so I wouldn't argue just yet that Campbell's campaign is heading

Roll Call March 12, 1998

in the right direction," Democratic Senatorial Campaign Committee spokesman Michael Tucker said in a fax.

But Roy said that's about what he would expect from Democratic candidate Dottie Lamm's campaign at this point. "That's the most campaign activity we have seen from the Dottie Lamm campaign in two months. I guess if I had a candidate like Dottie Lamm who is as invisible as she is, I would be attacking my

opponents' staff also."

Campbell's not the only GOP Senate candidate busy solving internal problems.

GOP operative Jack St. Martin has headed out west to serve as Rep. Linda Smith's (R-Wash) new campaign manager.

St. Martin spent two years as coalitions director for the Republican National Committee, where he was involved in outreach efforts to various constituencies. St. Martin recently left the Christian Coalition, where he served as deputy director of national operations.

The position has been open since Smith's original campaign manager, Scott Hildebrand, resigned earlier this year.

Roll Call March 12, 1998

Meanwhile, Sen. Carol Moseley-Braun's (D-Ill) campaign has hired longtime Democratic activist Michael Kreloff as her new campaign director. He replaces Lisa Cutler, who had resigned from the campaign for personal reasons.

Kreloff, who came on board last week, is a Chicago attorney who most recently served in Cook County Clerk David Orr's office. Over the years, Kreloff, 50, has worked on dozens of campaigns, including those of former Illinois Attorney General Neil Hartigan (D) and former Sen. Paul Simon (D-Ill) .

LANGUAGE: ENGLISH

LOAD-DATE: March 12, 1998

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<=1> View Related Topics

March 11, 1998

SECTION: STATE BY STATE; Pg. 16

LENGTH: 260 words

HEADLINE: COLORADO MATH: CAMPBELL ADDS AND SUBTRACTS

BODY:

Sen. Ben Nighthorse Campbell (R-Colo.) named National Republican Senatorial Committee (NRSC) Press Secretary Stuart Roy his new campaign manager Monday.

The announcement came on the heels of campaign upheaval last week when Steve Durham, the previous campaign manager, and several other top staffers resigned.

"I think it's going to be a good race, I think Sen. Campbell is in a great position for reelection," said Roy. Noting that Campbell's challenger is
Capitol Hill Publishing Corp., March 11, 1998

likely to be Dottie Lamm, he added, "I think Sen. Campbell matches up very well with Dottie both on issues and personality."

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Capitol Hill Publishing Corp., March 11, 1998

Robert Schlesinger

LANGUAGE: English

LOAD-DATE: March 11, 1998

EXHIBIT K

LEVEL 1 - 79 OF 365 STORIES

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The Bulletin's Frontrunner

March 12, 1998, Thursday

SECTION: US SENATE

LENGTH: 538 words

HEADLINE: CO: Romero Denies Quid Pro Quo.

BODY:

The Pueblo Chieftain (3/11, McAvoy) reported Democratic state Rep. Gil Romero "scoffs at talk that he is sponsoring legislation to shake up the state Board of Medical Examiners" on behalf of campaign contributors Malik and Seeme Hasan. The Hasans have contributed \$2,000 to Romero's campaign, and Mrs. Hasan is his finance chairwoman. Republican state Rep. Martha Kreutz said Romero's bill "to overhaul the Colorado Medical Practices Act was prompted by the state medical board's license suspension against Mrs. Hasan's brother, neurologist Imran Khan." Kreutz also "accused Malik Hasan, in turn, of lobbying against her bill that would have exposed insurers and managed health plans such as Foundation Health to medical malpractice lawsuits if they deny necessary care to their patients." However, Hasan said, "Gil is not the kind of guy who can be bought for \$2,000. We are supporting Gil Romero not because any deal has been made but because his election would be good for Pueblo." In addition, Romero "denied he was doing the Hasans or Mrs. Hasan's brother a favor." Romero said his legislation would not permit Khan "to get back his license," and that his "sole motivation is to open up the Board of Medical Examiners process of disciplining physicians to more public scrutiny."

The Bulletin's Frontrunner March 12, 1998, Thursday

Campbell Campaign Reorganizes.

The Colorado Springs Gazette-Telegraph (3/11, Anton) reported on the recent staff turnover in the campaign of Republican Sen. Ben Nighthorse Campbell.

Stuart Roy, who left his position as press secretary with the National Republican Senatorial Committee to manage the campaign, "arrived Tuesday to rebuild the staff and get the campaign back on track." Roy said, "The fundamentals are all in place, fundraising is going well and nothing has slowed down." He also "downplayed the significance of losing almost the entire campaign staff less than 30 days before the party precinct caucuses." The Gazette-Telegraph added the former campaign aides were "reluctant to talk about the details of why they left, but some felt there was a conflict over control of the campaign and poor relations with the Senate staff."

EXHIBIT L

LEVEL 1 - 73 OF 365 STORIES

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The Bulletin's Frontrunner

April 3, 1998, Friday

SECTION: US SENATE

LENGTH: 301 words

HEADLINE: CO: Lamm Declares Candidacy.

BODY:

The Denver Post (4/3) reported Democratic candidate Dottie Lamm yesterday "formally kicked off her campaign, taking aim at incumbent Republican Sen. Ben Nighthorse Campbell and firing off a few critical salvos. Ignoring her opponent in the race for the Aug. 11 primary, state Rep. Gil Romero, Lamm instead focused on Campbell." Said Lamm: "I will be a leader and not someone who watches from the sidelines. With all due respect, that's not the kind of senator we have now." Lamm said Campbell "voted against the McCain- Feingold campaign finance reform" bill, adding: "We cannot save our democracy unless we clean up our political process and the way we elect people to office." The Post said Lamm "also said Campbell had voted against senior citizens' rights not to be

The Bulletin's Frontrunner April 3, 1998, Friday

drugged or tied up in a nursing home. And, she said, Campbell had opposed criminalizing the possession of guns on school property." Stuart Roy, spokesperson for Campbell's campaign, "said Lamm was just trying to divert attention from her own weaknesses." Said Roy: "Mrs. Lamm spent 12 years as the governor's wife, she has had a campaign for a year, and she still doesn't have an agenda. So this is the best she can do -- attack her opponent." The Post added: "Roy said he was amazed at the lack of knowledge and information Lamm seemed to possess about crucial Colorado issues." Lamm "vowed to push for legislation to enable parents of infants and adopted children to stay home with their new charges." Lamm advocated " efforts to provide tax incentives for businesses to set up on-site child care, ' and "straddled the traditional party platforms, pledging to bring down the \$5.5 trillion debt at the same time she called for Federal education funding for smaller class sizes and school construction."

LANGUAGE: ENGLISH

LOAD-DATE: April 3, 1998