

**BOB GREENLEE**

2076 HARDCRABBLE DRIVE  
BOULDER, COLORADO 80303  
(303) 554-1323 FAX

JUL 17 3 31 PM '00

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL

July 12, 2000

Mr. William Messenger  
FEDERAL ELECTIONS COMMISSION  
999 E. Street, N.W.  
Washington, D. C. 20463

Re: MUR 5030


Dear Mr. Messenger:

Thank you for providing me with additional time to respond to your letter of inquiry and notice of pending actions. It has taken some time to review the matters previously reported to you.

Enclosed is an affidavit statement of Julie Herrmann who handled the matters referenced in the MUR during the period of the campaign. I have reviewed this letter and believe it adequately covers all of the matters subject to your inquiry.

It is embarrassing to someone like myself who believes in full and timely reporting to campaign financing to be in a position of reporting the errors which have obviously occurred.

Sincerely,

  
Bob Greenlee

**Affidavit of Julie Herrmann** >

>  
>

First being duly sworn under oath, I submit the following information to the Federal Election Commission concerning MUR 5030:

My name is Julie Herrmann and I presently reside at 10255 Dover Street, #235, Westminster, CO 80021.

In 1998 I was a full-time employee of the Greenlee for Congress campaign committee. Among my various duties, I was the staff person responsible for filing and reporting of certain information to the Federal Election Commission and other legal authorities. Specifically, I was also the person responsible for the proper reporting of information to the FEC under the "48-hour notice" rule.

Through the November 1998 election, I was unaware of any reporting irregularities to the FEC, other than the mis-reporting of the Bank One contribution, (and which was rectified by an amended 48 Hour Report on November 9, 1999). Throughout the rest of the 48-hour reporting period--to the best of my knowledge and belief--I properly made all required reports on behalf of the Greenlee for Congress committee.

In February of 1999, I was notified that the Greenlee for Congress committee had received an inquiry letter from the Federal Elections Commission. I was provided with a copy of that letter which was dated February 2, 1999. The letter indicated that the committee may have had certain problems with the proper reporting of information related to the 1998 campaign--particularly as related to the "48-hour notice". The letter recommended that we review our procedures for checking contributions received during the "48-hour notice" period.

In looking over the materials required to provide a response to the FEC's February 2, 1999 letter, I did discover certain errors and discrepancies concerning my previously filed reports. I undertook a detailed examination of each of the questionable items reported. Specifically, I reviewed Schedule A of the 30-day post general filing report inasmuch as that appears to be the source of information on which a review of our procedures seems to have been made. Until the receipt of this letter, and my subsequent review of various documents and records, I was unaware that there was any reason to believe there may have been any inadvertent irregularities in the information and data previously reported.

In a letter dated February 16, 1999, written and mailed by me, every attempt was made to rectify the inadvertent errors. Throughout the course of the campaign, I made every attempt to make sure that the campaign provided full and accurate information to the FEC, members of the campaign staff, the candidate, and members of the campaign finance committee. We developed what I considered to be

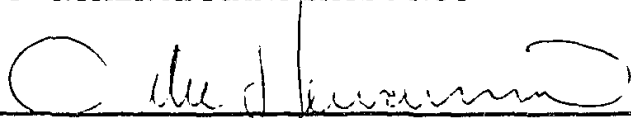
a reasonable system of checks and balances concerning our campaign financing and reporting..

All data was entered into a custom-designed campaign tracking system (Aristotle). I did have at least two volunteer assistants helping me with recordkeeping during this period of time but I assume total responsibility for administering the committee's records and properly submitting required reports.

On or about the 25<sup>th</sup> of June, 2000, I was notified by Bob Greenlee that he had received a *followup letter from the Federal Election Commission* which was dated June 19, 2000. Mr. Greenlee was out of town until June 25<sup>th</sup> which accounted for the delay in receiving the June 19<sup>th</sup> letter. Mr. Greenlee asked me to once again review this matter and attempt to more fully explain the discrepancies and any irregularities with the regard to previously filed reports.

Upon reviewing the letter and its attachments, it appears to me that your current letter reviews the information previously covered in the February 16, 1999 response letter with the addition of imposing a substantial fine for the inadvertent errors previously discovered and reported by me. I again went to the source documents used in preparing the February, 16<sup>th</sup> response to make sure nothing more might have been in error. In doing so, I discovered that I have no clear record of whether six of the contributions, representing about \$10,000.00 in receipts were actually subject to the 48-hour reporting requirement. According to the rules—as I understand them—contributions **received** from October 15, 1998 would have been *subject to the 48-hour reporting period*. Although deposit of these checks clearly occurred after October 15, 1998, I have every reason to believe that these six checks were **received** by the campaign prior to October 15<sup>th</sup>. In fact, each of the dates of the checks received show dates of contribution prior to October 15<sup>th</sup>. (See Attachment 1)

FURTHER AFFIANT SAYET NOT

  
\_\_\_\_\_  
(signed) Julie Herrmann

STATE OF COLORADO

)

) ss.

City and County of Boulder

)

The foregoing affidavit by Julie Herrmann was acknowledged before me this  
12 day of July, 2000.

Witness my hand and official seal.

My commission expires: 2/17/04

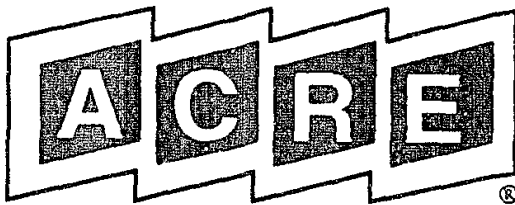
SEAL



*Laura E. Rodgers*  
Notary Public

2004-04-10 14:04:40

Attachment 1



## ACTION COMMITTEE FOR RURAL ELECTRIFICATION

4301 WILSON BOULEVARD  
ARLINGTON, VA 22203-1860  
(703) 907-5826  
FAX (703) 907-5516

October 6, 1998

Greenlee for Congress Committee  
26 Garden Center, Suite 3A  
Broomfield, Colorado 80234

Dear Mr. Greenlee:



On behalf of the Action Committee for Rural Electrification (ACRE), I am pleased to forward to your campaign committee a check in the amount of \$1,000 for your 1998 General Election. This contribution was endorsed by the rural electric program leaders in the state of Colorado and represents funds derived from more than 19,000 individual contributions of approximately \$36 each by rural electric leaders and members throughout the nation.

The ACRE program was created 32 years ago to provide an opportunity for rural electric leaders to help candidates for office who understand the basic needs and goals of rural electrification. ACRE is bipartisan and bases its support on one very firm principle: support those candidates who support the goals and objectives of rural electrification and rural people.

ACRE is affiliated with the National Rural Electric Cooperative Association (NRECA), which represents the legislative interests of the nation's nearly 1,000 rural electric systems and their 125 million consumer-members before the U.S. Congress. Should you ever have questions or need information concerning our program, please feel free to call me at our offices in Arlington, Virginia.

REMITTANCE VOUCHER - DETACH BEFORE DEPOSITING

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

	<b>Action Committee For Rural Electrification</b> 4301 Wilson Boulevard Arlington, VA 22203-1860 Telephone (703) 907-5826	First Union National Bank of Virginia Arlington, VA 68-769 / 560 331	2080
PAY	ONE THOUSAND DOLLARS	1000.00	*****1000.00
TO THE ORDER OF	GREENLEE FOR CONGRESS COMMITTEE 26 GARDEN CENTER SUITE 3A BROOMFIELD, CO 80234	 AUTHORIZED SIGNATURE	
		TWO SIGNATURES REQUIRED FOR ALL CHECKS	

TOM DELAY CONGRESSIONAL COMMITTEE  
10707 Corporate Drive, Suite 130 PH. 281-491-8663  
Stafford, TX 77477

6513

One thousand dollars and 00 cents

DATE  
10/06/98  
AMOUNT  
\$1000.00

PAY  
TO THE  
ORDER  
OF  
Bob Greenlee for Congress Committee  
26 Garden Center, suite 3-A  
P.O. Box 4298  
Broomfield, CO 80020

TOM DELAY CONGRESSIONAL COMMITTEE  
10707 CORPORATE DR., STE. 130 (281) 491-8663  
STAFFORD, TX 77477

SOUTHERN NATIONAL BANK OF TEXAS  
SUGAR LAND, TX  
35-1526/1130  
301844

6513

PAY  
One thousand dollars and 00 cents

DATE  
10/06/98  
AMOUNT  
\$1000.00

TO THE  
ORDER  
OF  
Bob Greenlee for Congress Committee  
26 Garden Center, suite 3-A  
P.O. Box 4298  
Broomfield, CO 80020

*David L. Greenlee*  
AUTHORIZED SIGNATURE

⑈006513⑈ ⑆113015267⑈ 215 4711⑈

0247 204 40 02



October 6, 1998

Bob Greenlee  
Bob Greenlee for Congress Committee  
26 Garden Center, Suite 3A  
P.O. Box 4298  
Broomfield, CO 80020

Dear Bob:

Enclosed is a check for a \$1,000 for your campaign efforts. Please give us a call if we can help your campaign in any way. Best of luck in November. Keep the faith!

Sincerely,

Tom DeLay

**AICPA EFFECTIVE LEGISLATIVE COMMITTEE**  
A MULTICANDIDATE POLITICAL COMMITTEE

Check Number **50615**

1-103  
210

Pay to the Order of **Bob Greenlee for Congress Committee** Date **10/08/1998** Check Number **50615** Amount **\$\*\*\*\*\*1,500.00**

*Karen Sullivan* MP  
*John Medley* MP

Bankers Trust Company  
280 Park Avenue, New York, New York 10017 83

Check Number **50615**

Invoice or Ref.	Date		Gross Amount	Discount	Net Amount
GENERAL CONTRIBUTION	10/08/1998	USD	1,500.00	.00	1,500.00



Mary E. Medley

1,500.00 .00 1,500.00

**J. Thomas Higginbotham**  
Vice President-Congressional & Political Affairs



American Institute of Certified Public Accountants  
1455 Pennsylvania Avenue, NW, Washington, DC 20004-1081  
(202) 434-9205 fax (202) 638-4515  
Internet: JHigginbotham@aicpa.org

233264





**Martha Lynch Cash Management Account**  
**THOMAS S. KAVANAGH**  
65 BELLEVUE DR.  
BOULDER, CO 80302

527

Pay to the  
order of

*Bob Greene For Lawless Courtse. \$1000.00*

10/14 1998 25.80  
440

**BANK ONE**

BANK ONE OF COLUMBUS, NA  
Columbus, Ohio 43271

Dollars

Memo

*Will*

2221 204 40 02

PAID BY  
CASH

Greenlee for Congress

Two thousand five hundred and no/100 \*\*\*\*\* DOLLARS

Greenlee for Congress  
26 Garden Center  
Broomfield, CO 80020

*Mark R. Elam*  
*Richard J. Elam*

MEMO

⑈00005029⑈ ⑆054000522⑆ 206584539⑈

AMERICAN COUNCIL OF LIFE INSURANCE  
POLITICAL ACTION COMMITTEE

Amount: \$2,500.00

5029

☐ Earmarked

FEC line: FEC 23

Purpose: Contribution: Bob Greenlee (CO-2-R)  
Office: Federal House  
Election: General 1998  
Recipient: Greenlee for Congress  
26 Garden Center  
Broomfield, CO 80020

Party: Republican  
State: CO  
District: 2

AMERICAN COUNCIL OF LIFE INSURANCE  
POLITICAL ACTION COMMITTEE

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Election: General 1998  
Recipient: Greenlee for Congress  
26 Garden Center  
Broomfield, CO 80020

Party: Republican  
State: CO  
District: 2



**American Council of Life Insurance**

Carroll A. Campbell, Jr.  
President & Chief Executive Officer

October 14, 1998

Mr. Bob Geenlee  
Greenlee for Congress  
26 Garden Center  
Broomfield, CO 80020

Dear Bob:

Please find enclosed a check for \$2,500 from the American Council of Life Insurance Political Action Committee for use towards your 1998 General Campaign.

On behalf of the 532 members of the American Council of Life Insurance, in particular those companies located in your great state that support the American Council of Life Insurance Political Action Committee, I congratulate you and look forward to working with you on issues of mutual concern.

Sincerely,

Carroll A. Campbell, Jr.

Enclosure: Check (\$2,500)

HERSCHEL B. EATHERTON  
E. PAULINE EATHERTON  
9298 E. NASSAU AVE.  
DENVER, CO 80237

82-438/1070  
3813615111

582

DATE 10-14-98

PAY TO THE ORDER OF *Bob Greenlee for Congress* \$1,000.00  
*One Thousand & no/100* DOLLARS

**STBANK**

TECH CENTER, N.A.  
2000 S. W. 44th  
MIAMI, FL 33155  
(305) 377-8000

MEMO

*Herschel B. Eaterton*