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COMMISSION

AUG -2 1991

OFFICE OF GENERAL
COUNSEL

Mr. Jeffrey S. Jordan
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR # 6296 Response of Declaration Alliance

Dear Mr. Jordan or To Whom It May Concern:

We have received the Complaint filed in the above-referenced Matter Under Review ("MUR 6296").

The Complaint is factually incorrect and based on false statements. The Declaration Alliance is not guilty of any violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

Please be advised as follows:

1. Declaration Alliance has not at any time communicated directly or indirectly, with any person, agent, or representative of the Ken Buck for Senate campaign or, for that matter, any other federal campaign.
2. The advertisements sponsored by Declaration Alliance were developed independently of any candidate or political party and/or any agents of the candidate or political party. They do not electioneer, advocate, or advise supporting or rejecting any candidate or election campaign.
3. Advertisements and public communications sponsored by Declaration Alliance are based on factual information regarding the public records of several prominent Republicans who claim to be conservatives but who are not. The website of Declaration Alliance lists several Republican officials and former officials who fall into this category. Declaration Alliance is committed to raising public awareness of the factual records particularly of GOP officials whose rhetoric does not match their tax-and-spend records.
4. There has been and is no vendor involved with Declaration Alliance who is a common vendor to any federal candidate or political party referenced in the Declaration Alliance communications.
5. Neither Declaration Alliance nor its vendor(s) and agent(s) had any communications with the Buck for Senate campaign regarding the Declaration Alliance advertisements and other activities prior to the dissemination of the communications publicly.
6. Declaration Alliance advises the Commission that media buys are a matter of public record at the stations airing advertising and that information is known to anyone who is in contact with the stations,

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and information about media buys is regularly known prior to airing of ads for which time has been purchased.

In short, Mr. Grice (who filed the Complaint) has done so in a desperate attempt to smear Declaration Alliance. However, the information he has included in his Complaint about Declaration Alliance is completely false.

Declaration Alliance did not coordinate its communications with the Ken Buck campaign, or any other person or campaign. No agent or representative of Declaration Alliance coordinated with any representative or agent of any campaign regarding the Declaration Alliance advertisements and other communications. The Declaration Alliance advertisements are not electioneering communications.

The Complaint and the MUR should be dismissed as it relates to Declaration Alliance.

The statements in this Response are true and correct to the best of my knowledge and belief. I make these statements with the knowledge that it is unlawful to make a false statement to a federal agency pursuant to 18 U.S.C. §1001.

Please contact me at 703-204-0164 if you have additional questions. Thank you.

Sincerely,



Daniel M. Gray, President

Declaration Alliance
2400 Earls Gate Court
Reston VA 20191
703-264-2024

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