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January 31, 2010

VIA HAND DELIVERY

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Reference Number

032566.00001

Re: MUR 6438  
Art Robinson for Congress and Noah Robinson, as Treasurer

Dear Mr. Jordan:

This response, including exhibits, is submitted on behalf of Art Robinson for Congress (the "Robinson Campaign") and Noah Robinson, as Treasurer (collectively "Respondents"), in response to a complaint filed on December 6, 2010 by Trent Lutz, Executive Director of the Democratic Party of Oregon ("DPO" or "the Democratic Party").

The Democratic Party's imaginative complaint alleges a laundry list of violations, including claims that Respondents received excessive contributions and illegal corporate contributions, failed to report in-kind contributions and contribution conduits, failed to use their best efforts to collect and report contributor information and failed to satisfy various disclaimer requirements. These allegations are based not on facts, but on the DPO's blatant speculation as to what the Robinson Campaign "must" have done during the 2010 election. The speculative nature of the complaint makes it clear that this matter is a blatant attempt to impose legal costs on the Robinson Campaign, to intimidate Dr. Robinson from running again in 2012 and to simply squander the limited resources of the Federal Election Commission ("FEC" or "the Commission"). Thus, for the reasons stated below, the Commission should take no further action against Respondents and close this matter.

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### I. SUMMARY OF THE FACTS & LEGAL ARGUMENTS

On April 16, 2010, Trent Lutz, Executive Director of the DPO, filed a baseless complaint with the FEC in an attempt to derail Republican candidate Dr. Arthur Robinson from his campaign to be elected to a seat in the House of Representatives for Oregon's Fourth Congressional District. See Complaint, MUR 6273 (Art Robinson for Congress, *et al.*) (April 15, 2010). On September 3, 2010, by a vote of 6 to 0, the Commission dismissed the DPO's complaint based, in part, on its findings that the allegations were "speculative in nature." See General Counsel's Report, MUR 6273 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010); accord Certification, MUR 6273 (Art Robinson for Congress) (Sept. 3, 2010).

Despite being successful in defending against the DPO's frivolous claims, however, Dr. Robinson was unsuccessful in his campaign for Congress, losing to Democratic incumbent Peter DeFazio by a small margin. Dr. Robinson won 44.5% of the vote with DeFazio winning 53.7%. Nevertheless, Dr. Robinson announced that he would run for election again in 2012. In response to Dr. Robinson's announcement, on December 6, 2010, the Democratic Party again filed this meritless complaint against the Robinson Campaign and its Treasurer. See Complaint, MUR 6438 (Art Robinson for Congress) (Dec. 6, 2010).

Nothing lies at the heart of this action except the Democratic Party's disturbing attempt to handicap a serious threat to Representative DeFazio's re-election in 2012. The Democratic Party's complaint is a brazen attempt to force Dr. Robinson to expend his resources responding to ridiculous allegations, several of which the FEC has already considered and rejected.

In the complaint, the Democratic Party alleges that Respondents received excessive campaign contributions by collecting over \$2,400 from individual contributors. This allegation is simply false. The Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 *et seq.* ("FECA"), provides that Respondents could collect more than \$2,400 per contributor because

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Dr. Robinson participated in separate elections to win the nominations of the Republican and Independent parties. See Or. Rev. Stat. § 248.090; Adv. Op. 2004-20, 1978-30.

The DPO also speculates that Respondents use of *Access to Energy* and the Robinson Curriculum's subscriber lists for fundraising constituted illegal corporate contributions. This allegation was based on DPO's mere suspicion that either Althouse Press or the Oregon Institute of Science and Medicine (or "OISM") must own either *Access to Energy* and the Robinson Curriculum's subscriber lists, and must have given both lists to Respondents to use for fundraising. This too is false as neither Althouse Press nor OISM own either subscriber lists. Also, Althouse Press cannot make an illegal corporate contribution because it is not a corporation, as the Commission already determined in MUR 6273. See General Counsel's Report, MUR 6273 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010).

Next, the DPO contends that Respondents were required to report use of *Access to Energy* and the Robinson Curriculum's subscriber lists as in-kind contributions. This contention is erroneous because the *Access to Energy* subscriber list is Dr. Robinson's personal property and the cost of renting the Robinson Curriculum's list was less than the \$200 reporting requirement for disbursements. Thus, no reporting was necessary. See 11 C.F.R. §§ 104.13(a)(1), 104.3(a)(4)(i).

The DPO further fabricates that Respondents had to report *Access to Energy*, Althouse Press or OISM as conduits that received and forwarded contributions to Respondents. The DPO's argument is based solely on the fact that *Access to Energy* and Althouse Press shared a post office box with the Robinson Campaign. The Commission, however, has already rejected the DPO's prior claim that the Robinson Campaign could not share the same post office box with *Access to Energy* and Althouse Press. See General Counsel's Report, MUR 6273 at 2 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010). Further, *Access to Energy* and Althouse Press cannot be corporate conduits because neither are "persons" capable of being a conduit under the

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Act. See 11 C.F.R. § 110.10. Also, no contributions were sent to OISM's address. Accordingly, this claim too holds no weight.

The DPO goes on to allege that Respondents failed to use their best efforts to collect and report contributor occupation and employer information. See 11 C.F.R. § 104.7(b)(1). Respondents, however, earnestly sought to obtain the requisite information. Respondents sent contributors who failed to provide occupation and employer information a follow-up letter clearly requesting the missing information. In fact, despite their statutory obligation to send only one follow-up letter, Respondents sent multiple letters to contributors in an effort to obtain and report the requisite information. Moreover, Respondents took remedial action upon realizing any information was missing. Thus, the matter does not warrant the FEC's attention.

Finally, the DPO claims Respondents' solicitations failed to contain the appropriate disclaimers regarding who paid for the communication. Despite the DPO's contentions, the May 2010 edition of *Access to Energy* clearly stated on the third page of the newsletter that the candidate paid for the issues of *Access to Energy* that contained solicitations, which satisfies 11 C.F.R. § 110.11(c)(2)(iv). Respondents admit that this information was inadvertently omitted from the March 2010 edition of *Access to Energy*. Similarly, an attachment accompanying the September 5, 2010 solicitation letter to *Access to Energy* readers clearly contains the required disclaimer that the letter was paid for by Art Robinson for Congress. Finally, Respondents made a good faith effort to comply with the statute by attempting to include the required disclaimer on the emails to the Robinson Curriculum subscribers, but the disclaimer was omitted due to a simple technical error.

Accordingly, Respondents Art Robinson for Congress and Noah Robinson respectfully request that the Commission reject the Democratic Party's frivolous complaint, conserve its resources for more significant matters, and close this matter without taking any additional action against Respondents.

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## II. STATEMENT OF THE FACTS

In March 2010, Dr. Arthur Robinson sought the Republican nomination for a seat in the House of Representatives representing Oregon's Fourth Congressional District. Dr. Robinson is a scientist and educator who had never run for elected office before 2010 and had no experience running a campaign. Although Dr. Robinson's son, Noah Robinson, had no experience working on campaigns, he offered to assist his father on the Robinson Campaign by serving as Treasurer and Campaign Manager. Unfortunately, in November 2010, Dr. Robinson lost the general election to Congressman Peter DeFazio. Nonetheless, Dr. Robinson has made it clear that he will run against Congressman DeFazio again in 2012.

As thoroughly discussed in MUR 6273, Dr. Robinson is a scientist and educator directly associated with *Access to Energy*, Althouse Press, and the Oregon Institute of Science and Medicine. See General Cosmel's Report, MUR 6273 (Art Robinson for Congress, et al.) (Aug. 19, 2010). *Access to Energy* and Althouse Press are not corporations and have no employees. *Access to Energy* is a monthly science and engineering newsletter Dr. Robinson writes and publishes through Althouse Press and distributes to almost 3,500 friends, family and colleagues in the scientific community. Althouse Press is registered with the Oregon Secretary of State as an assumed business name. See Oregon Secretary of State, Business Registry Business Name Search (attached as Exhibit 1). Dr. Robinson pays all of the production and mailing costs related to *Access to Energy* out of his own pocket. Income from *Access to Energy*, if any, is reported as Dr. Robinson's personal income on his annual income tax returns. The Robinson Curriculum is a home-schooling curriculum designed by Dr. Robinson and his late wife and sold by Dr. Robinson.

OISM is a 26 U.S.C. § 501(c)(3) non-profit research institute Dr. Robinson formed to conduct scientific research. It operates solely from the support of donations from private individuals and other entities. OISM is located at 2251 Dick George Road in Cave Junction, Oregon, on a 500-acre ranch where Dr. Robinson also lives. Because the ranch does not receive

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direct mail delivery, mail sent to Dr. Robinson, Robinson for Congress, *Access to Energy* and Althouse Press is delivered to a common post office box in the Cave Junction, Oregon post office. Mail sent to OISM is delivered to a separate post office box at the same post office.

### III. LEGAL ARGUMENTS

The DPO's complaint consists largely of allegations that the Commission has either already rejected in MUR 6723 or that are based on sheer speculation. See General Counsel's Report, MUR 6273 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010). Thus, this Commission should dismiss the DPO's complaint as it warrants no further attention.

First, Respondents did not solicit or receive excessive campaign contributions. The Robinson Campaign was entitled to raise funds under separate \$2,400 limits for the Republican Party primary and the Independent Party primary because they were separate elections under Oregon and federal law. Second, Respondents did not receive illegal corporate contributions from Althouse Press or OISM by using the subscriber lists of *Access to Energy* and the Robinson Curriculum to raise funds, because neither Althouse Press nor OISM own those subscriber lists. And, as the Democratic Party is well-aware, Althouse Press is not a corporation and thus cannot make illegal corporate contributions.

Third, Respondents did not have to report using *Access to Energy* or the Robinson Curriculum's subscriber lists as in-kind contributions because the *Access to Energy* subscriber list is Dr. Robinson's personal property and the cost of renting the Robinson Curriculum's list was less than the \$200 reporting requirement for disbursements. Fourth, Respondents did not have to report *Access to Energy*, Althouse Press or OISM as conduits that received and forwarded contributions. *Access to Energy* and Althouse Press cannot be conduits because neither are a "person" as defined by the Act. See 11 C.F.R. § 110.10. Moreover, the mere fact that *Access to Energy* and Althouse Press shared a common post office box with the Robinson

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Campaign does not mean that either entity was a conduit for contributions to the campaign. Finally, OISM was not a conduit because it never received any contributions for the campaign.

Fifth, notwithstanding the DPO's claims, Respondents used their best efforts to collect and report contributor information. 11 C.F.R. § 104.7(b)(1). Respondents earnestly sought to obtain employer and occupation information by sending contributors several letters clearly requesting the necessary information be provided and returned in self-addressed, stamped envelopes. And sixth, Respondents' solicitations largely satisfied the Act's disclaimer requirement regarding who paid for the solicitation but inadvertently omitted the best efforts disclaimer. Nonetheless, Respondents' solicitations clearly conveyed that either Dr. Robinson or the Robinson Committee authorized and paid for them and no member of the public would have been misled otherwise.

Accordingly, Art Robinson for Congress and Noah Robinson respectfully request that the Commission disregard the Democratic Party's frivolous claims, conserve its resources for more significant matters, and close this matter without taking any further action.

### 1. Respondents Did Not Receive Excessive Contributions

The Democratic Party alleges that the Robinson Campaign received excessive contributions in violation of 2 U.S.C. § 441a, which prohibits candidates from receiving more than \$2,400 per election from any person. 2 U.S.C. § 441a(a)(1). The DPO's allegations are meritless as all contributions received by the Robinson Campaign were within statutory limits. In fact, the DPO's claim that Respondents could not receive contributions in connection with the Independent Party primary is incorrect as a matter of law. Further, the Committee has taken all necessary steps to correct any error regarding excessive contributions. Accordingly, the DPO's argument fails.

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Despite the DPO's claim, the Robinson Campaign was entitled to raise funds under separate \$2,400 limits for the Republican Party primary and the Independent Party primary because they were separate elections. The Act defines an election to include "a general, special, primary, or runoff election[.]" 2 U.S.C. § 431(1)(A) and (B); accord see 11 C.F.R. § 100.2. The issue of whether a particular event constitutes an election is governed by the relevant state law. See Adv. Op. 2004-20, 1992-25, 1986-17, 1984-16. Under Oregon law, minor parties are authorized to nominate candidates and to conduct their own primaries.<sup>1</sup> See Or. Rev. Stat. § 248.009 (2010). The Commission has held that any primary which results in a candidate receiving the nomination of a party is considered a separate election for which the candidate may accept contributions under 2 U.S.C. § 441. See Adv. Op. 2004-20 (holding candidate may accept contributions for each election she was involved in during the primary process); Adv. Op. 1978-30 (holding candidate may accept multiple contributions from an individual where the candidate is selected by the convention as a nominee to run in the ensuing primary and/or general election). Hence, in such circumstances, candidates may accept multiple contributions of \$2,400 per person where each contribution is for a separate election. See Adv. Op. 2004-20, 1978-30.

Here, Respondents were entitled to accept two \$2,400 contributions from the same person because Dr. Robinson was involved in two separate primary elections. Dr. Robinson was a candidate in the Republican Party primary and the Independent Party primary.<sup>2</sup> Oregon law permits the Independent Party as a minor party to nominate its own candidate and conduct its own primary. As a candidate for both parties, Dr. Robinson ran in both primary elections and Respondents lawfully collected funds to support his campaign. See Adv. Op. 2004-20, 1978-30.

<sup>1</sup> The Democratic Party was well-aware that the Independent Party was permitted to conduct its own primary under Oregon law. Two of the Democratic Party's nominees for Congress also ran for the Independent Party nomination in their respective congressional districts. In fact, Democratic Congressman Peter DeFazio ran against Dr. Robinson for the Independent Party nomination, but was defeated by Dr. Robinson who won 56% of the vote. See Exhibit 2.

<sup>2</sup> The Democratic Party erroneously claimed that Dr. Robinson raised funds separately for the Constitution Party nomination. This is false. Dr. Robinson merely participated in the Constitution Party convention.



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Moreover, the DPO misplaces its reliance on Advisory Opinions 1982-47 and 1994-29 to support its argument that candidates seeking the nomination of multiple parties cannot raise funds under separate limits for each nomination sought. In those opinions, the Commission forbade New York congressional candidates from collecting funds above the statutory limit because the New York minor party primaries occurred on the same day as the Republican Party primary. See Adv. Op. 1994-29, 1982-47. In Respondents' case, the Republican Party primary was on May 18, 2010 and the Independent Party primary was on July 30, 2010. Thus, the rationale in Advisory Opinions 1982-47 and 1994-29 is not applicable here.<sup>3</sup> Despite the DPO's allegations, Respondents' receipt of contributions after the date of the Republican Party primary election was not unlawful because those contributions were accepted for the Independent Party primary and not to retire debt from the Republican Party primary. See 11 C.F.R. § 110.1(b)(3)(i).

Moreover, the Commission's Reports Analysis Division ("RAD") authorized Respondents to accept additional contributions for the Independent Party primary. In an effort to ensure compliance with the FECA, counsel for Respondents contacted the Robinson Campaign's RAD analyst, Benjamin J. Holly, on three separate occasions in June, July and September of 2010 regarding the issue of accepting contributions for the Independent Party primary. Mr. Holly and RAD Branch Division Chief Madalyn Lane instructed Respondents that, because the Commission had failed to decide whether the Independent Party of Oregon primary was a separate election under the FECA, the Reports Analysis Division would not consider contributions made in connection with the Independent Party primary to be excessive even if the same contributor had already given the maximum \$2,400 contribution in connection with the

<sup>3</sup> Furthermore, the Advisory Opinion the Democratic Party relies upon makes clear that the Robinson Campaign was authorized to accept funds for each primary election! Advisory Opinion 1982-47 plainly states that the "[S2400] limitation applies to contributions to a candidate: *unless he is a candidate in more than one election.*" Adv. Op. 1982-47 (emphasis added). Hence, not only is the Democratic Party incorrect in its conclusion and erroneous in its analysis, but it has disregarded the law to further its ill-motivated campaign to discredit Respondents before the Commission.

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Republican Party primary. Mr. Holly instructed Respondents to report any contributions received for the Independent Party primary as contributions for an "other" election. Respondents fully complied with his instruction. See Exhibit 3. Thus, Respondents did not violate the Act.

Finally, the DPO complaint alleges that the Robinson Campaign illegally accepted four specific excessive contributions. In fact, as the DPO should have known, the Robinson Campaign has taken the required steps to either refund or reattribute those contributions. First, the excess contribution made by Mr. David Lawson was returned on October 25, 2010 and the refund was reported accordingly on the Robinson Campaign's 30-Day Post-General Election Report. That report was filed with the Commission on December 2, 2010 – four days before the DPO filed the complaint in this matter. See Exhibit 4. The contributions of Messrs. Cliff Naser and Darren Unthank appear to be excessive because the Robinson Campaign inadvertently attributed to them contributions that had in fact been made by their spouses. The Robinson Campaign has filed amended October 15<sup>th</sup> Quarterly and 12-Day Pre-General Election Reports reattributing the Naser and Unthank contributions to their respective spouses. See Exhibit 5. Finally, John Tomkins' contribution was identified as excessive by the Respondents and they are in the process of returning the \$600 excess to the contributor. That refund will appear on the Robinson Campaign's next report to the Commission. Accordingly, the Commission should disregard the Democratic Party's baseless claims that the Robinson Campaign received excessive contributions.

### **2. Respondents Did Not Receive Illegal Corporate Contributions**

The Democratic Party attempts to revive allegations that the Commission has already rejected in MUR 6273. See General Counsel's Report, MUR 6273 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010). The DPO speculates that Respondents received illegal corporate contributions from Althouse Press and OISM in violation of 11 C.F.R. § 114.2(f), which prohibits corporations from making or facilitating contributions to candidates. § 114.2(f)(1), (f)(2)(i)(C). More specifically, the Democratic Party assumes that either Althouse Press or

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OISM must own the *Access to Energy* and the Robinson Curriculum subscriber lists and must have given both lists to Respondents to use for fundraising. These allegations are simply false based on facts known to the DPO when it filed this complaint.

Foremost, neither Althouse Press nor OISM own the *Access to Energy* or the Robinson Curriculum's subscriber lists. Thus, neither could have facilitated Respondents' use of the lists. In fact, the Robinson Campaign paid the Robinson Curriculum 4 cents per name to send solicitations to a portion of the Curriculum's e-mail list. The cost of renting the list amounted to less than the \$200 reporting requirement for itemized disbursements. See 11 C.F.R. §§ 104.3(a)(4)(i), 104.13(a)(1).

Further, Althouse Press could not engage in corporate facilitation because it is *not a corporation*. Althouse Press is merely a fictitious business name used by Dr. Robinson and "nothing more than one of Robinson's personal assets." See General Counsel's Report, MUR 6273 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010). This was made clear in the FEC's dismissal of the DPO's first unfounded complaint against Dr. Robinson. *Id.*

Indeed, the Democratic Party's fanciful allegations are nothing more than political shenanigans and conduct worthy of sanction. Thus, its complaint should be dismissed.

3. **Respondents Were Not Required to Report Use of the *Access to Energy* or the Robinson Curriculum's Subscriber Lists as In-Kind Contributions**

Despite the Democratic Party's claims that Respondent violated reporting requirements under 2 U.S.C. § 434, Respondents did not have to report using the *Access to Energy* or the Robinson Curriculum subscriber lists. As stated, *Access to Energy* is simply a science newsletter Dr. Robinson personally creates and publishes. Its subscriber list is a subset of Dr. Robinson's personal rolodex of friends, family and scientific colleagues. The Commission has never held that a candidate's use of his personal rolodex to solicit contributions requires the candidate to assign a fair market value to the list and report it as an in-kind contribution.

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Respondents were not required to report the rental of the Robinson Curriculum subscriber list either. The Robinson Campaign paid the Robinson Curriculum to rent 3,278 email addresses – not 60,000 – from the Robinson Curriculum subscriber list at a cost of 4 cents per name. The cost of renting these addresses amounted to \$131.12, which did not have to be itemized in a report as it was less than \$200. See 11 C.F.R. §§ 104.3(a)(4)(i), 104.13(a)(1). Thus, Respondents were not required to report using either the *Access to Energy* or the Robinson Curriculum's subscriber list as in-kind contributions.

4. **Respondents Need Not Report Access to Energy, Althouse Press or OISM as Conduits**

The Democratic Party's allegation that *Access to Energy*, Althouse Press and OISM acted as conduits for the Robinson Campaign is patently ridiculous.

Under the Act, a candidate or committee must report each conduit or intermediary who forwards contributions in excess of \$200 from the contributor to the candidate or committee. See 11 C.F.R. § 110.6(C)(2)(i). A conduit or intermediary means "any person who receives and forwards an earmarked contribution to a candidate or a candidate's authorized committee." 11 C.F.R. § 110.6(b)(1). Neither *Access to Energy* nor Althouse Press or OISM were conduits for the Robinson Campaign.

The DPO's conduit argument is based solely on the fact that *Access to Energy* and Althouse Press shared a post office box with the Robinson Campaign. The Commission, however, has already rejected the DPO's prior claim that the Robinson Campaign could not share the same post office box with *Access to Energy* and Althouse Press. See General Counsel's Report, MUR 6273 at 2 (Art Robinson for Congress). Also, the Robinson Campaign's use of the common post office box was paid for by Dr. Robinson and reported as an in-kind contribution. See Exhibit 6.

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In addition, *Access to Energy* and Althouse Press cannot be conduits because neither are "persons" as defined by the Act; rather, they are just alter-egos of Dr. Robinson as the Commission has already determined in MUR 6273. See 11 C.F.R. § 100.10 ("Persons means an individual, partnership, committee, association, corporation, labor organization, and any other organization, or group of persons. . ."); accord see General Counsel's Report, MUR 6273 at 3 (Art Robinson for Congress, *et al.*) (Aug. 19, 2010).

Finally, no contributions were sent to OISM's address and there are no allegations otherwise. Accordingly, this claim holds no weight.

### 5. Respondents Used Their Best Efforts to Report Contributor Information

Notwithstanding the Democratic Party's claims, Respondents used their best efforts to obtain and report the occupation and employer information of their contributors.

The FECA requires a candidate committee to use its best efforts to obtain a contributor's full name, mailing address, occupation, and employer name. See 2 U.S.C. §§ 434(b)(3)(A), 431(13); 11 C.F.R. § 104.7(b)(1). To demonstrate "best efforts," the committee treasurer must: include on all written solicitations a clear request for the contributor's requisite information and an accurate statement of federal law regarding collection and reporting of this information; make at least one attempt to obtain any missing information within 30 days of receiving the contribution; and absent receiving complete information, the treasurer must disclose any information received regarding the contributor during the same two-year election cycle. See 11 C.F.R. § 104.7(b). If the treasurer shows he used best efforts to obtain the information, any reports submitted by the committee will be deemed to comply with the Act. See 2 U.S.C. § 432(i); accord see 11 C.F.R. § 104.7.

Respondents earnestly sought to obtain the requisite information from contributors in order to comply with the best efforts requirement. For instance, Respondents included a clear

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written request for contributor occupation and employer information as an attachment to their September 5, 2010 fundraising letter. The DPO's complaint does not include a legible copy of this written request (see Attachment G, Complaint, MUR 6438 (Art Robinson for Congress) (Dec. 6, 2010)). Accordingly, Respondents have affixed a legible version of the request for contributor information hereto. See Exhibit 7.

Moreover, Respondents sent contributors who failed to supply occupation and employer information *not one but two* follow-up letters clearly requesting that the employment information be provided and returned in self-addressed, stamped envelopes. See Exhibit 8 (filed with the Commission in response to a request for additional information from the Reports Analysis Division).

This matter is similar to MUR 5957 (Committee to Elect Sekhon), where a novice candidate failed to report occupation and employer information for a significant number of contributors. Respondents should not be held liable for not reporting information its contributors refused to provide. As the Commission has noted, there are legitimate reasons a contributor will not provide employment information:

It is possible that some contributors simply do not believe it appropriate for the federal government to require the identification of their occupation or name of employer . . . . Some contributors are genuinely reluctant to answer the question, more out of a personal embarrassment or even "principle" than out of a desire, for example, to conceal embarrassing professional connections.

Statement of Reasons of Commissioners M. Petersen, C. Hunter & D. McGahn II , MURs 5957, 6031 at 8 (The Committee to Elect Sekhon, et al.) (June 24, 2009) (quoting Comments of Robert Bauer, Perkins Coie, Recordkeeping & Reporting by Political Committees: Best Efforts, 57 Fed. Reg. 44,137 (Sept. 24, 1992), at 4-5)). Hence, contributors are often skeptical of requests for employment information.

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Contributors to the Robinson Campaign share Dr. Robinson's healthy skepticism of the reach and intrusiveness of the federal government. In fact, the Robinson Campaign received over 250 anonymous contributions from individuals who wished to support his campaign without having to disclose their identities at all to the federal government.

Notwithstanding contributors' affirmative refusal to supply their occupation and employer information, the DPO claims that Respondents could have obtained missing contributor information by extracting information they may have provided when contributing to other candidates or groups. The FECA does not require a campaign to investigate its own contributors. Rather, it merely requires Respondents make one request for the missing information. See 11 C.F.R. § 104.7(b)(1). Respondents met *and exceeded* their burden. Accordingly, the Commission should take no further action. See Statement of Reasons of Commissioner M. Peterson, C. Hunter & D. McGahn II, MURs 5957, 6031 at 11-12 (The Committee to Elect Seikhon, *et al.*) (June 24, 2009) (dismissing allegations that the Hagan Committee violated FECA by failing to obtain and report occupation and employer information).

### 6. Respondents' Solicitations Satisfied the Act's Disclaimer Requirements

The Democratic Party boldly alleges that Respondents failed to adhere to the Act's sponsorship identification requirements in their solicitations. In fact, Respondents' made a good faith effort to ensure that all communications made it clear who paid for the message.

The Act requires candidates provide a disclaimer on all solicitations disseminated by mail, newspapers, magazines and other broadcasting mediums. 2 U.S.C. § 441d(a). This disclaimer requirement also applies to all email communications sent to more than 500 recipients. 11 C.F.R. § 110.11. The disclaimer must provide who paid for and authorized the communication. See 2 U.S.C. § 441d(a). If the communication was authorized and paid for by a candidate or candidate's committee, the communication must provide a statement to that effect.

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Id. at § 441d(a)(1). The disclaimer, however, “need not appear on the front or cover page of the communication as long as it appears within the communication[.]” 11 C.F.R. § 110.11(c)(2)(iv).

Despite the DPO’s claims, the May 2010 edition of *Access to Energy* conspicuously stated that Dr. Robinson paid the entire cost of the issues that solicited contributions to the Robinson Campaign. This statement was positioned on the third page of the newsletter under the heading “Federal Election Laws.” (See Attachment B, Complaint, MUR 6438 (Art Robinson for Congress) (Dec. 6, 2010)). The DPO simply sought to disregard it in an attempt to further its efforts to peddle a meritless complaint to the FEC. Hence, Respondents were in compliance with the regulations. See 11 C.F.R. § 110.11(c)(2)(iv).

Similarly, the September 5, 2010 solicitation letter to subscribers of *Access to Energy* also included a clear disclaimer on an attachment, which indicated that the mailing had been paid for by Art Robinson for Congress. The DPO provided an illegible copy of the attachment in its complaint. (See Attachment G, Complaint, MUR 6438 (Art Robinson for Congress) (Dec. 6, 2010)). A legible copy is attached hereto as Exhibit 9. Accordingly, the September 5, 2010 solicitation letter complied with the Commission’s disclaimer regulations. 11 C.F.R. § 110.11(c)(2)(iv).

A technical error was responsible for the absence of the disclaimers on the emails sent to the Robinson Curriculum subscribers. Respondents drafted the correct language to be placed in the footer of each email, however, the individual who sent out the emails failed to transfer the statutory language. The Commission typically does not take action against respondents who have failed to satisfy disclaimer requirement because a technical error was made in disseminating the communication or the disclaimer was missing in whole or in part.<sup>4</sup>

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<sup>4</sup> The Commission has routinely and repeatedly dismissed complaints where the defects in the disclaimer were unsubstantial. See also General Counsel’s Report, MUR 6265 (Gause); MUR 1628 (Hawberry); MUR 5727 (Kaloogian); MUR 5834 (Burner); MUR 6006 (Lunsford); MUR 6032 (Leatherwood); MUR 6042 (Roberts); MUR 6016 (Coe).

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Nonetheless, it was obvious to the recipients that Respondents authorized and paid for the emails based on their content and the circumstances surrounding their dissemination. The Commission has held that the disclaimer requirement is met where it is clear to the public who is responsible for the particular communication. See MUR 6027 (Dole) (disclaimers sufficient to "indicate that the public would not have been misled as to who paid for the advertisement"); MUR 5775R (Pryce) ("it appears that viewers were apprised of the salient information"). Respondents' emails unequivocally communicated that they were paid for by the Robinson Campaign. For instance, eight of these emails were sent from the Treasurer's email address; the emails were signed by the Treasurer, Noah Robinson; the emails rallied public support for Dr. Robinson's campaign; the emails directed recipients to the campaign website for more information; and the emails stated that the mailing address was "Art Robinson for Congress, P.O. Box 1250, Cave Junction, OR 97523."

Furthermore, Dr. Robinson's March edition of *Access to Energy* contained sufficient identifying information to prevent the public from being misled as to who authorized and paid for the solicitation. The newsletter was written by Dr. Robinson and they identified him as the publisher and editor; Dr. Robinson identified himself as running for Congress and promoted the Robinson Campaign in the newsletter; Dr. Robinson requested any fundraising checks be addressed to "Art Robinson for Congress"; and the newsletter went to regular *Access to Energy* subscribers who were familiar with the nature of the newsletter. Thus, because it was clear Respondents authorized and paid for the solicitations, this matter does not warrant further investigation.<sup>5</sup>

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<sup>5</sup> See General Counsel's Report, MUR 6260 (Radzkowski) (recommending dismissal where "communications contained sufficient identifying information to prevent public from being misled"); General Counsel's Report, MUR 6229 (Hughes) (recommending dismissal where text of 10,000 flyers included Committee's official name and address and were distributed by Committee members); MUR 6213 (DUMPRIED PAC) (dismissing complaint where solicitation contained partial identification of sender); MUR 6252 (Otjen) (dismissing complaint where public would not have been misled as to whether candidate approved ads that were sent from her campaign website and identified the candidate as the sender).

## Arent Fox

### IV. CONCLUSION

For all of the reasons discussed above, the Commission should recognize the complaint filed by the Democratic Party of Oregon for what it is – an attempt to intimidate a formidable candidate from running again against a long-term incumbent. Accordingly, the Commission should find that there is no reason to believe Respondents Art Robinson for Congress or Noah Robinson, as Treasurer, violated 2 U.S.C. §§ 434, 441a(a) or 441b and the Commission should exercise its prosecutorial discretion and take no further action against Respondents for any inadvertent violations of 2 U.S.C. § 441d.

Respectfully submitted,

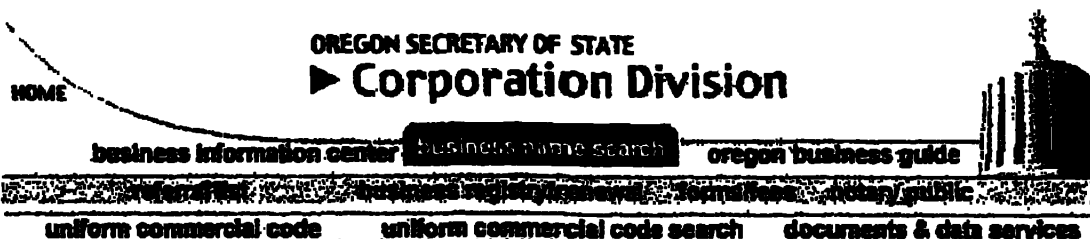
  
Brett G. Kappel

*Counsel for Respondents  
Art Robinson for Congress and Noah Robinson, as Treasurer*

12044321824

12044321825

## **EXHIBIT 1**



## Business Name Search

### Search for a Business Name in the Business Registry Database

Key all or part of a business name, or a registry number.

Business Name ALTHOUSE PRESS

or

Registry Number

Search for Business Name

Clear

Search  
Help

Other Government Databases

Associated Business  
Search

By Business  
By Individual

#### Search Methods (More restrictive to Less restrictive):

- ☐ Business Name Availability Check. Very restrictive. ☐ Search for Active and Inactive businesses.
- ☐ Positional.  
Only (As keyed).
- ☐ Exact words in exact word order. (Only. As keyed) ☐ Search for Active businesses only.
- ☐ Fastest.
- ☐ Exact words in exact word order. (Followed by anything else) ☐ Search for Inactive businesses only.
- ☐ Exact words in any word order.
- ☐ Sound-alike words in exact word order. Adds sound-alike style search results.
- ☐ Sound-alike words in any word order.
- ☐ Extended Search in any word order. Adds Synonym style search results. More names returned. Slowest.

## Business Registry Business Name Search

New Search

Business Entity Data

06-08-2010

11:45

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Next Renewal Date	Renewal Due?
352461-80	ABN	ACT		06-29-1993	06-29-2011	
Entity Name	ALTHOUSE PRESS					
Foreign Name						
Affidavit?	N					

New Search

Associated Names

Type	PPB	PRINCIPAL PLACE OF BUSINESS		
Addr 1	2251 DICK GEORGE RD			
Addr 2				
CSZ	CAVE JUNCTION	OR	97523	0000 Country UNITED STATES OF AMERICA

The Authorized Representative address is the mailing address for this business.

Type	REP	AUTHORIZED REPRESENTATIVE	Start Date	06-29-1993	Resign Date	
Name	ARTHUR	B	ROBINSON			
Addr 1	2251 DICK GEORGE RD					
Addr 2						
CSZ	CAVE JUNCTION	OR	97523		Country	UNITED STATES OF AMERICA

Type	REG	REGISTRANT		
Name	ARTHUR	B	ROBINSON	
Addr 1	2251 DICK GEORGE RD			
Addr 2				
CSZ	CAVE JUNCTION	OR	97523	Country UNITED STATES OF AMERICA

New Search

Name History

Business Entity Name	Name Type	Name Status	Start Date	End Date

ALTHOUSE PRESS.

| EN | CUR | 06-29-1993 |

Please read before ordering Copies.

New SearchSummary History

Image Date	Action	Transaction Date	Effective Date	Status	Name/Agent Change	Dissolved By
06-09-2009	RENEWAL PAYMENT	06-09-2009		SYS		
05-24-2007	RENEWAL PAYMENT	05-24-2007		SYS		
05-27-2005	RENEWAL PAYMENT	05-27-2005		SYS		
06-02-2003	RENEWAL PAYMENT	06-02-2003		SYS		
05-18-2001	RENEWAL PAYMENT	05-18-2001		SYS		
06-04-1999	STRAIGHT RENEWAL	05-26-1999		FI		
06-04-1997	STRAIGHT RENEWAL	05-27-1997		FI		
05-24-1995	STRAIGHT RENEWAL	05-24-1995		FI		
06-29-1993	NEW FILING	06-29-1993		FI		

<u>New Search</u>	Counties	
	<b>Counties Filed</b>	
	Josephine	
	<b>Counties Not Filed (but not necessarily available)</b>	
	Baker, Benton, Clackamas, Clatsop, Columbia, Coos, Crook, Curry, Deschutes, Douglas, Gilliam, Grant, Harney, Hood River, Jackson, Jefferson, Klamath, Lake, Lane, Lincoln, Linn, Malheur, Marion, Morrow, Multnomah, Polk, Sherman, Tillamook, Umatilla, Union, Wallowa, Wasco, Washington, Wheeler, Yamhill	

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12044321828

HOME

OREGON SECRETARY OF STATE

## ► Corporation Division

business information center

business name search

oregon business guide

uniform commercial code

uniform commercial code search

documents &amp; data services

## Business Name Search

Business Entity Types	
Code	Description
ABN	Assumed Business Name
AOG	Act Of Government
DBC	Domestic Business Corporation
DBT	Domestic Business Trust
DCOOP	Cooperative
DDNP	District Improvement Nonprofit
DDIP	District Improvement Profit
DLLC	Domestic Limited Liability Company
DLLP	Domestic Registered Limited Liability Partnership
DLP	Domestic Limited Partnership
DNF	Domestic Nonprofit Corporation
DPC	Domestic Professional Corporation
FBC	Foreign Business Corporation
FBT	Foreign Business Trust
FLLC	Foreign Limited Liability Company
FLLP	Foreign Registered Limited Liability Partnership
FLP	Foreign Limited Partnership
FNP	Foreign Nonprofit Corporation
FPC	Foreign Professional Corporation
REG	Registered Name
RES	Reserved Name

[About Us](#) | [Announcements](#) | [Laws & Rules](#) | [Feedback](#)  
[Site Map](#) | [Policy](#) | [SOS Home](#) | [Oregon Blue Book](#) | [Oregon.gov](#)

For comments or suggestions regarding the operation of this site,  
 please contact : [businessregistry.sos@state.or.us](mailto:businessregistry.sos@state.or.us)



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12044321830

### **EXHIBIT 3**



**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (In full)USE FEC MAILING LABEL  
OR TYPE OR PRINTExample: If typing, type  
over the lines

ART ROBINSON FOR CONGRESS

ADDRESS (number and street)

2251 DICK GEORGE RD

Check if different  
than previously  
reported. (ACC)

CAVE JUNCTION

OR

97523

2. FEC IDENTIFICATION NUMBER

C00481341

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

OR

04

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

X July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TEL)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Constitution (12C)

Special (12S)

Election on

In the  
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the  
State of

5. Covering Period

04

29

2010

through

06

30

2010

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

Noah Robinson

Signature of Treasurer

Electronically Filed by Noah Robinson

Date

07

15

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)

FESAN018

12044321831

A. Form/Schedule : F3N

Transaction ID :

Dr. Robinson was the winning candidate in the May 18, 2010 Republican Party primary election and is now a candidate in the July 30, 2010 Independent Party of Oregon primary election. The Republican Party primary and the Independent Party of Oregon primary are separate elections with separate contribution limits. The July 16th Quarterly Report Initiative contributions and expenditures made in connection with both primaries. FEC Form 3 does not contemplate a situation in which the same individual is a candidate in two separate primary elections in the same reporting period. Accordingly, Art Robinson for Congress has designated contributions and expenditures made in connection with the May 18, 2010 Republican Party primary as being for the Primary election and has designated contributions and expenditures made in connection with the July 30, 2010 Independent Party of Oregon primary as being for the Other election.

12044321832

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 6 / 90

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	<input type="checkbox"/> 15
---	------------------------------	------------------------------	------------------------------	-----------------------------	------------------------------	------------------------------	-----------------------------	-----------------------------

Any 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)  
**ART ROBINSON FOR CONGRESS**

A.

Full Name (Last, First, Middle Initial)  
**Dan B Adams**Mailing Address **1011 S. Bufile Crest St.**City **Pavson** State **AZ** Zip Code **85541**FEC ID number of contributing  
federal political committee.**C**Name of Employer  
Best EffortsOccupation  
Best EffortsReceipt For: 2010  
Primary General  
☒ Other (specify) ▼  
Other

Election Cycle-to-Date ▼

**300.00**

Date of Receipt

M M / D D / Y Y Y Y  
**06 24 2010**Transaction ID: **SA11AI.9388**

Amount of Each Receipt this Period

**300.00**

B.

Full Name (Last, First, Middle Initial)  
**William E. Adams**Mailing Address **PO Box 1**City **Portersville** State **PA** Zip Code **18061**FEC ID number of contributing  
federal political committee.**C**Name of Employer  
Best EffortsOccupation  
Best EffortsReceipt For: 2010  
X Primary General  
Other (specify) ▼

Election Cycle-to-Date ▼

**500.00**

Date of Receipt

M M / D D / Y Y Y Y  
**05 06 2010**Transaction ID: **SA11AI.8800**

Amount of Each Receipt this Period

**500.00**

C.

Full Name (Last, First, Middle Initial)  
**Gene Alley**Mailing Address **348 Calle Bahia**City **San Clemente** State **CA** Zip Code **92672**FEC ID number of contributing  
federal political committee.**C**Name of Employer  
The E.T. Horn CompanyOccupation  
CEOReceipt For: 2010  
Primary General  
☒ Other (specify) ▼  
Other

Election Cycle-to-Date ▼

**1000.00**

Date of Receipt

M M / D D / Y Y Y Y  
**06 11 2010**Transaction ID: **SA11AI.9041**

Amount of Each Receipt this Period

**500.00**

SUBTOTAL of Receipts This Page (optional) ▶

**1300.00**

TOTAL This Period (last page this line number only) ▶

**SCHEDULE A (FEC Form 3 )**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

FOR LINE NUMBER:		PAGE 7 / 80	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any 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)  
**ART ROBINSON FOR CONGRESS**

A.

Full Name (Last, First, Middle Initial)

Terry M. Applegate

Mailing Address 14464 Dunn Rd.

City

Haslett

State

MI

Zip Code

48840

FEC ID number of contributing federal political committee.

C

Name of Employer  
Best Efforts

Occupation

Best Efforts

Receipt For: 2010

X Primary General

Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

Date of Receipt

 M M / D D / Y Y Y Y  
 05 03 2010

Transaction ID: SA11AI.8772

Amount of Each Receipt this Period

1000.00

B.

Full Name (Last, First, Middle Initial)

Lawrence Ariano

Mailing Address 2 S. 523 Madison St.

City

Warrenville

State

IL

Zip Code

60555

FEC ID number of contributing federal political committee.

C

Name of Employer  
Winfield Pathology Consultants

Occupation

Physician

Receipt For: 2010

X Primary General

Other (specify) ▼

Election Cycle-to-Date ▼

4800.00

Date of Receipt

 M M / D D / Y Y Y Y  
 06 14 2010

Transaction ID: SA11AI.9146

Amount of Each Receipt this Period

2400.00

C.

Full Name (Last, First, Middle Initial)

Steve M. Baker

Mailing Address 2128 Hudson Avenue

City

Richland

State

WA

Zip Code

99354

FEC ID number of contributing federal political committee.

C

Name of Employer  
INTERA Incorporated

Occupation

Consultant

Receipt For: 2010

X Primary General

Other (specify) ▼

Election Cycle-to-Date ▼

500.00

Date of Receipt

 M M / D D / Y Y Y Y  
 06 07 2010

Transaction ID: SA11AI.8965

Amount of Each Receipt this Period

250.00

SUBTOTAL of Receipts This Page (optional) ▶

3650.00

TOTAL This Period (last page this line number only) ▶

**SCHEDULE A (FEC Form 3 )**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

FOR LINE NUMBER: PAGE 9/90

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any 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)**  
**ART ROBINSON FOR CONGRESS**

A.

Full Name (Last, First, Middle Initial)

Kenneth J Bird

Mailing Address 966 El Cajon Way

City

Palo Alto

State

CA

Zip Code

94303

FEC ID number of contributing federal political committee.

C

Name of Employer  
noneOccupation  
geologist

Receipt For: 2010

Primary

General

X Other (specify) ▼  
Other

Election Cycle-to-Date ▼

500.00

Date of Receipt

 M M / D D / Y Y Y Y  
 06 13 2010

Transaction ID: SA11AI.9077

Amount of Each Receipt this Period

250.00

B.

Full Name (Last, First, Middle Initial)

Stanley Blake

Mailing Address 22959 Devin Drive

City

Buckeye

State

AZ

Zip Code

85326

FEC ID number of contributing federal political committee.

C

Name of Employer  
NoneOccupation  
None

Receipt For: 2010

Primary

General

X Other (specify) ▼  
Other

Election Cycle-to-Date ▼

500.00

Date of Receipt

 M M / D D / Y Y Y Y  
 06 16 2010

Transaction ID: SA11AI.9184

Amount of Each Receipt this Period

250.00

C.

Full Name (Last, First, Middle Initial)

Rudy Beschwitz

Mailing Address 330 Inland Lane North

City

Plymouth

State

MN

Zip Code

55447

FEC ID number of contributing federal political committee.

C

Name of Employer  
Best EffortsOccupation  
Best Efforts

Receipt For: 2010

X Primary

General

Other (specify) ▼

Election Cycle-to-Date ▼

232.00

Date of Receipt

 M M / D D / Y Y Y Y  
 05 10 2010

Transaction ID: SA11AI.9503

Amount of Each Receipt this Period

132.00

In-kind - mailing service

SUBTOTAL of Receipts This Page (optional) .....

632.00

TOTAL This Period (last page this line number only) .....

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 10/90

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

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NAME OF COMMITTEE (In Full)

ART ROBINSON FOR CONGRESS

A.

Full Name (Last, First, Middle Initial)

Meck Bray

Mailing Address 4545 S 257th East Ave.

City

Broken Arrow

State

OK

Zip Code

74014

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
SelfOccupation  
Self

Receipt For: 2010

Primary

General

X Other (specify) ▼  
Other

Election Cycle-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y  
06 29 2010

Transaction ID: SA11AI.9493

Amount of Each Receipt this Period

250.00

B.

Full Name (Last, First, Middle Initial)

Barrett J. Brogd

Mailing Address 1315 Glenwood Court

City

Milford

State

MI

Zip Code

48381

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
Best EffortsOccupation  
Best Efforts

Receipt For: 2010

X Primary

General

Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y  
05 07 2010

Transaction ID: SA11AI.8822

Amount of Each Receipt this Period

1000.00

C.

Full Name (Last, First, Middle Initial)

John B. Bryan

Mailing Address P.O. Box 1529

City

Lake Oswego

State

OR

Zip Code

97035

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
NoneOccupation  
Retired

Receipt For: 2010

Primary

General

X Other (specify) ▼  
Other

Election Cycle-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y  
06 14 2010

Transaction ID: SA11AI.9144

Amount of Each Receipt this Period

1000.00

SUBTOTAL of Receipts This Page (optional) ▶

2250.00

TOTAL This Period (last page this line number only) ▶

12044321837

**EXHIBIT 4**

**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

ART ROBINSON FOR CONGRESS

ADDRESS (number and street)

2251 DICK GEORGE RD

Check if different  
than previously  
reported. (ACC)

CAVE JUNCTION

OR

97523

2. FEC IDENTIFICATION NUMBER

C00481341

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS
- 
- REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

OR

04

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

- (b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Conversion (12C)

Special (12S)

Election on

in the  
State of

- (c) 30-Day POST-Election Report for the:

X

General (30G)

Runoff (30R)

Special (30S)

Election on

11

02

2010

in the  
State of

OR

5. Covering Period

10

14

2010

through

11

22

2010

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

Noah Robinson

Signature of Treasurer

Electronically Filed by Noah Robinson

Date

12

02

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)

FESAM18

12044321838



**SCHEDULE B (FEC Form 3)  
ITEMIZED DISBURSEMENTS**Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER:  
(check only one)

PAGE 196 / 196

☐ 17 ☐ 18 ☐ 19a ☐ 19b  
☒ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)  
ART ROBINSON FOR CONGRESS

A.

Full Name (Last, First, Middle Initial)  
David E. Lawson

Transaction ID: SB20A.17384

Date of Disbursement

M / D / Y  
10 / 25 / 2010

Mailing Address 14611 Minnich Rd.

City State Zip Code  
Hoagland IN 46745

Amount of Each Disbursement this Period

2400.00

Purpose of Disbursement  
Refund of Contribution

Candidate Name

Category/  
TypeOffice Sought: House  
Senate  
PresidentDisbursement For:  
Primary General  
Other (specify) ▼

State: District:

B.

Full Name (Last, First, Middle Initial)  
Peter J Travers

Transaction ID: SB20A.17459

Date of Disbursement

M / D / Y  
11 / 22 / 2010

Mailing Address P. O. Box B

City State Zip Code  
Hopewell NJ 08525-0000

Amount of Each Disbursement this Period

2400.00

Purpose of Disbursement  
Refund of Contribution

Candidate Name

Category/  
TypeOffice Sought: House  
Senate  
PresidentDisbursement For: 2012  
X Primary General  
Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional) ▶

4800.00

TOTAL This Period (last page this line number only) ▶

4800.00

12044321840

**EXHIBIT 5**

# FEC FORM 3

## REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: if typing, type over the lines

ART ROBINSON FOR CONGRESS

ADDRESS (number and street)

2251 DICK GEORGE RD

Check if different than previously reported. (ACC)

CAVE JUNCTION

OR

97523

2. FEC IDENTIFICATION NUMBER

C00481341

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS REPORT

NEW (N)

OR

X

AMENDED (A)

OR

04

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

X October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the State of

5. Covering Period 07 01 2010 through 09 30 2010

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 Noah Robinson

Signature of Treasurer Electronically Filed by Noah Robinson

Date 01 31 2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only

FEC FORM 3  
(Revised 02/2003)

FESAM218

12044321841

**SCHEDULE A (FEC Form 3 )**  
**ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:		PAGE 199 / 352	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14 <input type="checkbox"/> 15

Any 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)  
**ART ROBINSON FOR CONGRESS**

A.

Full Name (Last, First, Middle Initial)  
**Rush Naser**

Mailing Address **111 Desert Aire Place South**

City **Mattawa** State **WA** Zip Code **99349**

FEC ID number of contributing federal political committee. **C**

Name of Employer **n/a** Occupation **homemaker**

Receipt For: **2010** Election Cycle-to-Date **▼**  
Primary ☒ General ☐  
Other (specify) **▼** **2400.00**

Date of Receipt

M M / D D / Y Y Y Y  
**09 / 13 / 2010**

Transaction ID: **SA11AI.11623**

Amount of Each Receipt this Period  
**2400.00**

B.

Full Name (Last, First, Middle Initial)  
**John Nehel**

Mailing Address **Computer System Design Company**

City **Boulder** State **CO** Zip Code **80302**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Self** Occupation **Computing**

Receipt For: **2010** Election Cycle-to-Date **▼**  
Primary ☒ General ☐  
Other (specify) **▼** **500.00**

Date of Receipt

M M / D D / Y Y Y Y  
**09 / 13 / 2010**

Transaction ID: **SA11AI.11636**

Amount of Each Receipt this Period  
**500.00**

C.

Full Name (Last, First, Middle Initial)  
**John Henry Neller**

Mailing Address **853 W. Outer Dr.**

City **Oak Ridge** State **TN** Zip Code **37830**

FEC ID number of contributing federal political committee. **C**

Name of Employer **None** Occupation **None**

Receipt For: **2010** Election Cycle-to-Date **▼**  
Primary ☒ General ☐  
Other (specify) **▼** **300.00**

Date of Receipt

M M / D D / Y Y Y Y  
**08 / 13 / 2010**

Transaction ID: **SA11AI.13645**

Amount of Each Receipt this Period  
**200.00**

SUBTOTAL of Receipts This Page (optional) **▶**

**3100.00**

TOTAL This Period (last page this line number only) **▶**

12044321842

**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)USE FEC MAILING LABEL  
OR TYPE OR PRINTExample: If typing, type  
over the lines

ART ROBINSON FOR CONGRESS

ADDRESS (number and street)

2251 DICK GEORGE RD

Check if different  
than previously  
reported. (ACC)

CAVE JUNCTION

OR

97523

2. FEC IDENTIFICATION NUMBER

C00481341

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS  
REPORTNEW  
(N)

OR

X

AMENDED  
(A)

OR

04

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

X

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

11

02

2010

In the  
State of

OR

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the  
State of

5. Covering Period

10

01

2010

through

10

13

2010

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

Noah Robinson

Signature of Treasurer

Electronically Filed by Noah Robinson

Date

01

31

2011

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)

FESAN218

12044321843

**SCHEDULE A (FEC Form 3 )**  
**ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:		PAGE 65 / 82	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any 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)  
**ART ROBINSON FOR CONGRESS**

A.

Full Name (Last, First, Middle Initial)

Johanna Unthank

Mailing Address 20131 Bahama St

City

Chatsworth

State

CA

Zip Code

91311

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
Multi-Pak

Occupation  
Operations

Receipt For: 2010

Primary ☐ General ☒

Other (specify) ▼

Election Cycle-to-Date ▼

2400.00

Date of Receipt

MM / DD / YYYY  
10 / 13 / 2010

Transaction ID: SA11AI.17129

Amount of Each Receipt this Period

2400.00

B.

Full Name (Last, First, Middle Initial)

Paul Walter

Mailing Address P.O. Box 370

City

Merlin

State

OR

Zip Code

97352

FEC ID number of contributing  
federal political committee.

C

Name of Employer

Occupation

Receipt For: 2010

Primary ☐ General ☒

Other (specify) ▼

Election Cycle-to-Date ▼

1000.00

Date of Receipt

MM / DD / YYYY  
10 / 08 / 2010

Transaction ID: SA11AI.17348

Amount of Each Receipt this Period

1000.00

In-kind - Advertising

C.

Full Name (Last, First, Middle Initial)

Thomas A Ward

Mailing Address 5506 Jeffrey Way

City

Eugene

State

OR

Zip Code

97402

FEC ID number of contributing  
federal political committee.

C

Name of Employer  
Verizon Wireless

Occupation  
Sys Perf (electrical) Engineer

Receipt For: 2010

Primary ☐ General ☒

Other (specify) ▼

Election Cycle-to-Date ▼

750.00

Date of Receipt

MM / DD / YYYY  
10 / 10 / 2010

Transaction ID: SA11AI.16709

Amount of Each Receipt this Period

500.00

SUBTOTAL of Receipts This Page (optional) .....

3900.00

TOTAL This Period (last page this line number only) .....

12044321844

12044321845

**EXHIBIT 6**

**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

ART ROBINSON FOR CONGRESS

ADDRESS (number and street)

2251 DICK GEORGE RD

Check if different  
than previously  
reported. (ACC)

CAVE JUNCTION

OR

97523

2. FEC IDENTIFICATION NUMBER

C00481341

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS  
REPORT

X

NEW  
(N)

OR

AMENDED  
(A)

OR

04

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

X

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

11

02

2010

In the  
State of

OR

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the  
State of

5. Covering Period 04 01 2010 through 04 28 2010

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

Noah Robinson

Signature of Treasurer

Electronically Filed by Noah Robinson

Date 05 06 2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)

FESAN018

12044321846



**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: PAGE 67 / 80

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input checked="" type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any 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)

ART ROBINSON FOR CONGRESS

A.

Full Name (Last, First, Middle Initial)

Dr. ART ROBINSON

Mailing Address 2251 DICK GEORGE ROAD

City	State	Zip Code
CAVE JUNCTION	OR	97523

FEC ID number of contributing federal political committee. C H00R04073

Name of Employer  
Self-EmployedOccupation  
Chemist

Receipt For:	2010
X Primary	General
Other (specify) ▼	

Election Cycle-to-Date ▼
25228.77

Date of Receipt

M	M	/	D	D	/	Y	Y	Y	Y
0	4		2	8		2	0	1	0

Transaction ID: SA11D.6371

Amount of Each Receipt this Period

80.94

In-kind - Telephone Bill

B.

Full Name (Last, First, Middle Initial)

Dr. ART ROBINSON

Mailing Address 2251 DICK GEORGE ROAD

City	State	Zip Code
CAVE JUNCTION	OR	97523

FEC ID number of contributing federal political committee. C H00R04073

Name of Employer  
Self-EmployedOccupation  
Chemist

Receipt For:	2010
X Primary	General
Other (specify) ▼	

Election Cycle-to-Date ▼
25278.77

Date of Receipt

M	M	/	D	D	/	Y	Y	Y	Y
0	4		2	8		2	0	1	0

Transaction ID: SA11D.6373

Amount of Each Receipt this Period

50.00

In-kind - Post Office Box

C.

Full Name (Last, First, Middle Initial)

Dr. ART ROBINSON

Mailing Address 2251 DICK GEORGE ROAD

City	State	Zip Code
CAVE JUNCTION	OR	97523

FEC ID number of contributing federal political committee. C H00R04073

Name of Employer  
Self-EmployedOccupation  
Chemist

Receipt For:	2010
X Primary	General
Other (specify) ▼	

Election Cycle-to-Date ▼
25425.87

Date of Receipt

M	M	/	D	D	/	Y	Y	Y	Y
0	4		2	8		2	0	1	0

Transaction ID: SA11D.6375

Amount of Each Receipt this Period

147.10

In-kind - Telephone Service

SUBTOTAL of Receipts This Page (optional) .....

278.04

TOTAL This Page (last page this line number only) .....

12044321848

**EXHIBIT 7**

**Enclosed is my contribution to send Art Robinson to Congress.**

- ☐ I am sending a check made out to "Robinson for Congress" in the enclosed envelope  
☐ I am contributing by credit card at [www.ArtRobinsonForCongress.com](http://www.ArtRobinsonForCongress.com)  
☐ I am contributing by credit card below:

Name \_\_\_\_\_

Occupation\* \_\_\_\_\_

Street Address \_\_\_\_\_

Employers Name\* \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip \_\_\_\_\_

\*For donations of \$200 or more. If none, please write "none".

Credit Card Type: ☐ Visa ☐ Mastercard ☐ Amex ☐ Discover

Card Number \_\_\_\_\_

Amount \_\_\_\_\_

Exp. Date \_\_\_\_\_

Security Code \_\_\_\_\_

All individuals, including husbands and wives separately, can contribute up to \$2400 each. Contributions that were made before May 18th do not count toward this \$2400 limit. All contributions in any amount are very helpful.

67812577021

12044321850

**EXHIBIT 8**

RECEIVED

Art Robinson for Congress  
P.O. Box 1250  
Cave Junction, OR 97523  
ID# C0481341

2010 NOV 12 AM 8:25

FEC MAIL CENTER

Nov. 8, 2010

Benjamin J. Holly  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Holly,

This letter is in response to your letter of October 5<sup>th</sup>, 2010.

In this letter you ask that we clarify our procedures for establishing "Best Efforts" for information on contributors of \$200 or more. The required information includes, name, mailing address, occupation, and employer's name. In some instances, we do not have occupation and employer information, but we do have names and addresses for them - as we have reported to the FEC. Our contribution request forms ask for all required information, but occasionally our donors fail to fill it out, or send a contribution spontaneously that does not include all of it.

Our procedure has been to ask for the missing occupation and employer information in a personal letter to each individual within 30 days of receiving the donation. Our letter does NOT ask for money and included with it is a return envelope. Many of our donors have supplied information in response to this letter.

A sample of the letter we have been using is shown in Exhibit A. Although it is simple, we do not see anything wrong with it and as far as we can see it is perfectly adequate. The envelope that goes with it is shown in Exhibit B.

In response to your letter, however, we have acquired a sample letter from a professional organization. An example of this letter is shown in Exhibit C. We have sent this letter (along with another envelope as shown in Exhibit B) to everyone who has not yet provided complete information - even when the information has already been requested using our earlier letter. Although we are only legally required to send one letter we felt that, in view of your concerns, we should make this additional effort.

If you feel that anything in our procedure or follow up requests is inadequate, please inform us of what it is. It is our intention to completely satisfy the FEC legal reporting requirements.

Amended reports with any additional information will, of course, be filed soon.

Best Regards,

  
Noah Robinson (Treasurer)

12044321852

10030491354

Exhibit A

**Art Robinson for Congress**  
P.O. Box 1250  
Cave Junction, OR 97523  
(541) 255-2785

**RECEIVED**  
**2010 NOV 12 AM 8:25**  
**FEC MAIL CENTER**

**Nov. 8, 2010**

[Address] .

Dear [NAME],

Thank you for your contribution of [AMOUNT] to our Robinson for Congress campaign.

Federal election laws require that we ask all campaign contributors of \$200 or more for their occupation and employers name. This information can be mailed to our campaign in the enclosed envelope.

Thank you for your encouragement and support. We are doing our very best to succeed in this endeavor.

Sincerely yours,

Noah Robinson

12044321853

10030491355

12044321854

10030401356

Exhibit B

**ART ROBINSON FOR CONGRESS**  
**P.O. Box 1250**  
**Cave Junction, OR 97523**



Exhibit C

# Art Robinson for Congress

P.O. Box 1250, Cave Junction, OR 97523 • Ph. 1-541-255-2785

Nov. 8, 2010

[ADDRESS]

Dear [NAME]:

Thank you for your generous contribution to Art Robinson for Congress.

We apologize for the inconvenience, but Federal Election law requires our campaign to request for the record your employer and occupation information.

Please complete the form and return to us in the return envelope.

Thank you again for your generosity and support. Should you have any questions, please contact me at 1-541-255-2785.

Sincerely,

Noah Robinson  
Treasurer

## Employer and Occupation Response Form

Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in an election cycle. Contributions are not deductible as charitable contributions for Federal Income Tax purposes. Contributions from foreign nationals who do not have permanent residence in the United States are prohibited. Law also prohibits corporate contributions.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Employer: \_\_\_\_\_

Occupation: \_\_\_\_\_


Paid for by Art Robinson for Congress.

12044321855  
10030491357



12044321856

10030491358

Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS The FEC added this page to the end of this filing to indicate how it was received.	
<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 11/9/10
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (3/2005)	11/12/10 DATE PREPARED

12044321857

**EXHIBIT 9**

**Please help send Art Robinson to Congress!**

Let's send a scientist to Washington who will obey the Constitution, balance the budget, and roll back oppressive big government taxation and regulation that is destroying American free enterprise.

- ☐ I would like to volunteer. Please check activities that most interest you.
- ☐ Go Door to Door      ☐ Hand out Flyers      ☐ Make Phone Calls
- ☐ Put up Signs      ☐ Help with Events      ☐ Other \_\_\_\_\_
- ☐ I am contributing (see other side of card).
- ☐ Please bring me \_\_\_ campaign signs for my yard and to give to others (a volunteer will deliver these).

Name \_\_\_\_\_  
Street Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Ph. # \_\_\_\_\_  
E-mail \_\_\_\_\_

Paid for by Art Robinson for Congress
---------------------------------------