



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 812

Date Filmed 6/23/83 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

Consultation Materials

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Argonne W. Lallech

Date

6/8/87

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Employees of Bob Short)
Companies Committee)

MUR 812

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 28, 1980, do hereby certify that the Commission decided by a vote of 6-0 to authorize the Office of General Counsel to file a suit for relief in the United States District Court with respect to the above-captioned matter and to send the letter attached to the General Counsel's October 10, 1980 report on MUR 812.

Attest:

10/28/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

63040411295

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Short for Senate Committee)
of Volunteers)

MUR 812

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 28, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Authorize the Office of the General Counsel to file a suit for relief in the United States District Court.
2. Send the letter attached to the General Counsel's October 10, 1980 report.

Attest:

10/28/80

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

33040411230



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 31, 1979

Mr. Frank Walz
O'Connor & Hannan
Thirty-Eighth Floor, IDS Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Re: MUR 812

Dear Mr. Walz:

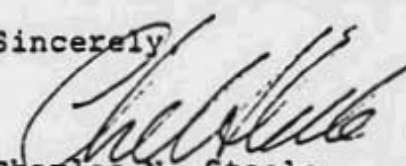
This letter is to advise you that the Commission has determined there is no reasonable cause to believe that your client, the Short for Senate Committee of Volunteers (SSCV) has violated 2 U.S.C. § 441b and has determined that it will take no action with regard to your client's violations of § 434(b) and 11 C.F.R. § 110.9(a).

The Commission has determined that the expenditures made on behalf of Mr. Short by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (JAB) and the Employees of Bob Short Companies Committee (Employees Committee) are not independent within the meaning of 2 U.S.C. § 431p. Accordingly, the expenditures are considered in-kind contributions (see 11 C.F.R. § 109.1(c)) reportable by SSCV pursuant to 2 U.S.C. § 434. Thus, the Commission's determination to take no further action with regard to SSCV's violation is contingent upon the filing of amended reports by SSCV.

The Commission requests that your client file amended reports reflecting receipt of \$30,122 from JAB and \$4,227 from the Employees Committee within thirty days or advise the Commission of your intentions in this matter. Upon receipt of the amended reports, I will recommend that the Commission close its file in this matter as it pertains to SSCV.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4035.

507,
Sincerely,


Charles N. Steele
General Counsel

RECEIVED
JAN 4 1980

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING

401 SECOND AVE. SOUTH

MINNEAPOLIS, MINNESOTA 55401

AREA CODE 612

TELEPHONE 332-0337

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

October 5, 1979

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

Enclosed, in affidavit form, are my answers to the questions which accompanied your letter of September 28, 1979.

The second paragraph asks that I submit other "factual or legal material" which I "deem relevant to the Commission's investigation of this matter."

I believe I have fully and adequately responded to each and every inquiry which the Commission has directed to me. I am not aware of any other material you might find helpful. If, however, there is anything else which you, or any member of your staff, believe pertinent and which I can supply, please let me know.

Sincerely,

FOSTER, JENSEN & SHORT


Brian P. Short

BPS/lk
Enclosure

STATE OF MINNESOTA
SS.
COUNTY OF HENNEPIN

Brian P. Short, being first duly sworn upon oath, deposes
and says:

1. On October 1, 1979, a letter dated September 28, 1979
from William C. Oldaker was received in my office. I did not see
this letter until late that evening or the next morning.

2. The following are my responses to the questions which
accompanied that letter:

Summary

The Just a Bunch of Plain DFL Folks Who Want
Common Sense Government Committee did not to the
best of my knowledge, have any formal bookkeeping
system. All bills, receipts, invoices, deposit
slips and other financial information were kept
by the members of the committee. From the scraps
of information and bank statements I prepared the
committee's reports.

1. I did not employ any formal bookkeeping
procedures. I did not keep a tally of
JAB's outstanding debts. Others may have
kept a tally of its assets.
2. Some of the deposit slips are in my handwriting
so I must have made some deposits. I do not
believe I ever made or authorized any withdrawals.
3. Some contributor information was forwarded to me
for use in preparation of JAB's financial reports.
4. I do not understand question. Financial information
came from members of the committee. Some information,
such as addresses or occupation of contributors
may have come from other sources (e.g. telephone
books).

5. Francis J. Ryan, Michael Ryan, D. D. Wozniak,
William O. Cooley.
6. No
7. No. I prepared all the Committee Reports at
my law office.
8. My office. I believe I asked my sister to
contribute at a restaurant.
9. Prior to my deposition in this matter, I didn't
know anything about it.
10. Prior to my deposition in this matter I didn't
know anything about it.
11. I have no present recollection that JAB ever
entered into a business relationship with
JFF & Associates. I do remember speaking to
Mr. Jens Paulucci in early November, before
the election.
12. N.A.
13. June, 1979.
14. Not before June, 1979.
15. After the election, I believe I sent Mr. Wozniak
copies of the financial reports.
16. Other than any involvement I may have had in
sending letters and telegrams to the FEC, I don't
believe I gave financial information to anyone.
I am sure I reported to a number of people that
I had succeeded in raising some money from my
brothers and sisters.
17. No
18. I do not know.
19. I do not have any idea.
20. It is not.

21. Apparently because the invoice was not in my file.
Further affiant saith not.


Brian F. Short

Subscribed and sworn to before me
this ____ day of October, 1979.

Notary Public

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date October 1978

Inv. No. **10415**

Your P. O. No. _____

[Short for Senate Committee of Vol.]
1011 Marquette Avenue
Minneapolis, MN 55403
Fred L. Gates, Campaign Manager
[R.J. Foster, Treasurer]

Don't Be Misled - (Newspaper Ads)

\$2,691.52

Job No.
753

0304041130

**JFP &
Associates, Inc**
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

**PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE**

CLIENT: **FERPICH-OLSON COMMITTEE**
ANDERSON VOLUNTEER COMMITTEE
SHORT FOR SENATE COMMITTEE OF VOLUNTEERS

Job No. 5753
Date October 19, 1978

PAGE AD: Don't Be Misled

MARKET	MEDIUM	DATES	TOTAL COST
Duluth Sunday News-Tribune		Sun. November 5	\$ 1,769.88
Hibbing Daily Tribune		Fri. November 3	457.52
International Falls Journal		Fri. November 3	361.20
Virginia Mesabi Daily News		Fri. November 3	553.84
Aurora East Range Shopper		Wed. November 1	101.47
Aurora Range Facts/Biwabik Times			
		Fri/Thu November 2/3	255.00
Bovey Scenic Range News		Thu. November 2	89.60
Chisholm Free Press		Thu. November 2	110.30
Chisholm Tribune Press		Tue. October 31	110.30
Duluth Budgeteer		Wed. November 1	805.69
Duluth Labor World		Thu. November 2	225.01
Ely Echo		Wed. November 1	295.84
Ely Miner		Wed. November 1	210.00
Floodwood Forum		Thu. November 2	84.00
Grand Rapids Review		Thu. November 2	255.00
Hashwauk Eastern Itasca		Thu. November 2	235.20
Instructor Journal		Thu. November 2	94.50
Tower News		Thu. November 2	105.00
Two Harbors Lake Co. News Chronicle		Wed. November 1	291.77
Eveleth Range Scene		Wed. November 1	181.18
Gilbert Herald		Wed. November 1	181.18
Cloquet Pine Knot		Thu. November 2	500.06
Aitkin Independent Age		Wed. November 1	167.70
Crow Wing County Review/Walker			
Pilot Independent		Thu. November 2	326.30
Moose Lake Star Gazette		Thu. November 2	307.02

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8535

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE

Job No. 5753

Date October 19, 1978

CLIENT:

MARKET	MEDIUM	DATES	TOTAL COST
--------	--------	-------	------------

000040411300
TOTAL COST: \$ 8,074.56

1/3 = \$ 2,691.52

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth Minn 55802 (216) 723-6500

Date October 1978

Inv. No. 10433

Your P. O. No. _____

Short For Senate Committee Of Vol.
1011 Marquette Avenue
Minneapolis, MN 55403
Fred Gates, Campaign Manager
R.J. Foster, Treasurer

Job No.

753

Special Interest - (Newspaper Ad)

\$958.86

6304041130

J. F. P. & Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (216) 727-8936

**PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE**

Job No. 5753

Date October 27, 1978

CLIENT: Anderson-Oberstar-Perpich-Short

FULL PAGE AD: Special Interest

MARKET	MEDIUM	DATES	TOTAL COST
Duluth	News Tribune & Herald	Thu.-Nov. 2, 1978	\$1733.76 gr./\$147
Udels - Hibbing	Tribune	Thu.-Nov. 2, 1978	\$457.52 gr./\$388.
Udels - Virginia	Mesabi Daily News	Thu.-Nov. 2, 1978	\$553.84 gr./\$470.
Udels - International Falls	Journal	Thu.-Nov. 2, 1978	\$361.20 gr./\$307.
Udels - Brainerd	Dispatch	Thu.-Nov. 2, 1978	\$433.44 gr./\$368.

3,559.76 3005
1000 270 60
3945

holding 4 way split = 884.74
could 271 to former
ad not killed - (late
comment from Duluth /
Gallant) 73.92
split 3 way. total

Anderson 958.96
Oberstar 854.94
Perpich 958.96
Short 958.96

Total 3761.52

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date November 6, 1978

Inv. No. 10473

Your P. O. No. _____

Just A Bunch Of DFL Folks Who Want
Common Sense Government Committee
401 Midwest Federal Building
St. Paul, MN 55101

Job No.

1239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01

330404113

J.F.P. & Associates, Inc.
 Advertising & Public Relations
 425 Lake Avenue South
 Duluth, Minn 55802 (218) 727-8836

**PROPOSED MEDIA SCHEDULE
 AND COST ESTIMATE**

Job No. 1239

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
 GOVERNMENT COMMITTEE

MARKET	MEDIUM	DATES	TOTAL COST
<u>KDAL-TV - Duluth, Min.</u>			
5 :30 spots & 4 :60 spots			\$1,294.00
<u>ND10-TV - Duluth, Min.</u>			
4 :30 spots			\$ 310.00
<u>KBJR-TV - Duluth, Min.</u>			
5 :30 spots			\$ 440.00
<u>WDSM-TV - Duluth, Min.</u>			
18 :60 spots			\$ 159.00
<u>KDAL-TV - Duluth, Min.</u>			
11 :60 spots			\$ 186.50

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8936

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE.

Job No. _____

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
GOVERNMENT COMMITTEE

pg. 2

MARKET	MEDIUM	DATES	TOTAL COST
<u>WAKX-AM/FM - Duluth, Mn.</u>			
13 :60 spots			\$ 124.60
<u>WEBC-AM - Duluth, Mn.</u>			
28 :60 spots			\$ 376.48
<u>WMEG-AM - Hibbing, Mn.</u>			
12 :60 spots			\$ 63.53

TOTAL: \$2,954.01
DUBS: 50.00

GRAND TOTAL: \$3,004.01

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

83040411
O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER

200 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402



Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RECEIVED

G00*

1762

00 JUN 25 AM 11:14

Law Offices
D. D. Wozniak

401 Midwest Federal Building, St. Paul, Minnesota 55101
(612) 227-9494

D. D. Wozniak

—
Edward J. Cleary
Associate

June 23, 1980

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

008744

In Re: MUR 812

Dear Mr. Steele:

Enclosed find (13) copies of a reply brief of "Just a Bunch"
(10) copies for the Commission and (3) for the General Counsel.

I am sending this on behalf of Mr. Wozniak who, unfortunately,
is hospitalized. He dictated this before he left and only
today was he able to proof read it. I believe it is due
tomorrow.

Mr. Wozniak will be returning to the office within 3-4 weeks.

Thank you for your consideration.

Very truly yours,
LAW OFFICES OF D. D. WOZNIAK

Gloria A. Juarez
Gloria A. Juarez,
Secretary to Mr. D. D. Wozniak

DDW:gaj

Enclosures

02:18 PM JUN 25 1980

RECEIVED

RECEIVED

33040411311

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF)	
)	
JUST A BUNCH OF PLAIN)	MUR 812, 853
DFL FOLKS WHO WANT COMMON)	
SENSE GOVERNMENT COMMITTEE)	

BRIEF OF THE RESPONDENT

I. General Statement.

In reviewing this matter, the Commission should not lose sight of the nature and origins of the complaints filed. The first complaint was filed by the campaign manager (Paul Overgaard) of Bob Short's opponent in the November 1978 general election. The second complaint was filed by a bitterly disappointed supporter (Ned Crosby) of Bob Short's opponent in the June 1978 DFL primary election. The gist of the complaints was that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("Just a Bunch") was receiving undisclosed financial support from Short's principal campaign committee, and that Just a Bunch was not "independent" for that reason.

Those irresponsible allegations, and a variety of other charges made in the complaints, have proven to be totally unfounded. Instead, what the Commission is now being presented with by the General Counsel, after one and one-half years of investigation, is a claim that the personal relationships of individuals involved in Just a Bunch with the candidate, and prior "contacts" with the campaign committee totally unrelated to the organization and functioning of Just a Bunch, somehow

destroy the independence of Just a Bunch, for contribution and reporting purposes, as a matter of law. If that is the law (and it simply cannot be), the law is flagrantly unconstitutional.

II. The Respondent's Position.

We can assure the Commission that the individuals principally identified with Just a Bunch, that is, former Minnesota Governor Rolvaag, and present and former Minnesota state legislators Rice, Wozniak and Popovich, while not cognizant of the myriad rules and regulations of the FEC, were and are politically sophisticated enough to know what "independent" is, from the standpoint of both control and financing.

Just a Bunch was completely independent of the campaign committee, both in terms of financing and in terms of the judgment exercised with respect to its political ads, sample ballots and other political activity. Those of us who participated in Just a Bunch were not satisfied with the conduct of the campaign. We were not satisfied with its direction. We were not satisfied with its deficiencies. We knew candidate Short and wanted to help him. We could not assist him through the main committee. We therefore established a separate, autonomous, independent committee, an activity which is and has been a common procedure in the State of Minnesota.

We were aware that if we wanted to do what we felt would be helpful, an independent committee was the only route to travel. We were also fully aware, based upon past experience, that the independent committee

must collect its money independently, and make its own decisions. That is exactly the way we proceeded. There is absolutely no evidence that we had any "contacts of a campaign nature" with Short's committee, its responsible officers, or persons authorized to act on its behalf as its authorized agents.

We felt strongly at that time, and feel strongly today, that we had and have a legal and constitutional right to so proceed.

Next, the record clearly and unequivocally discloses that shortly after formation of the committee, those of us who had organized Just a Bunch held a press conference explaining its membership, purposes and independence which was covered by all news media, including a TV appearance. No one, absolutely no one, in the State of Minnesota misunderstood the facts concerning the makeup of our independent committee, and its complete independence from the campaign committee.

Shortly thereafter, we took a one day airplane trip through parts of Minnesota to publicize our support of Bob Short. No one was in the dark or misled. And, contrary to the General Counsel's assertion, Mr. Short did not accompany us on this tour.

The General Counsel seems to contend that it is a violation of the statute for friends of a candidate to organize as an independent committee. Mr. Short was and is a long time friend. We cannot conceive of one volunteering the considerable time, money and energy we did in behalf of someone other than a friend. But friendship has no legal bearing on the independence of operation of a committee, and does not evidence "guilt" of anything.

The record also discloses that in the early stages of the General Counsel's investigation, the "independence" of Just a Bunch was prejudged, before any facts were gathered. Stated another way, we were presumed to be guilty before any investigation occurred. We strongly object to this type of treatment. It violates our fundamental right to freedom of expression and tends to chill our political activity on behalf of individuals of our choosing.

Those of us who participated in Just a Bunch know that we acted independently of the principal campaign committee, and know that our actions were not taken in cooperation or consultation with the campaign committee or done at the request or suggestion of anyone associated with the campaign committee. It is inconceivable to us that based upon the evidence of our dissatisfaction with the conduct of the campaign, and our formation of Just a Bunch in order to do something about it, the General Counsel or Commission could conclude that our expenditures and our decisions were not independent.

III. Comments on General Counsel's Brief.

We have the following additional comments on the General Counsel's brief.

The General Counsel states that Wozniak and Bob Short's campaign manager were in "substantial" disagreement about campaign strategy. Wozniak's contact with Gates was not "substantial". It was minimal, and not in person. It was enough, however, to be told by Gates that he and he alone was running the campaign, and no one else.

Next, Wozniak did not form Just a Bunch on October 25. He merely suggested it among friends. Those friends responded by meeting and organizing Just a Bunch on October 26.

Nor was Wozniak an "active participant" in Short's principal committee in any manner whatsoever. The record so discloses. The General Counsel states that Wozniak "worked in the St. Paul office" of the Short committee. This is absolutely, unequivocally untrue. He was in the office only once during the entire campaign. As stated in his deposition, Question: "Did you go to the Saint Paul Offices often, or -- ?" Answer: "That was the first and only time I went." The Short committee office was being run and staffed by other people, and Wozniak had nothing to do with it.

The General Counsel states that Mr. Popovich hosted the Short committee fundraiser held prior to formation of Just a Bunch. That is true, but it cannot possibly have any legal significance.

The General Counsel states that Mr. Rice was a "paid consultant" to the Short Committee. Again, Mr. Rice's consulting services were related to a special project which had nothing whatever to do with Just a Bunch.

The General Counsel states that Messrs. Rolvaag, Rice and Wozniak were on a so-called "advisory" committee of the Short committee. As specifically pointed out in the record, the advisory committee (such as it was) held only a very few meetings; held them only during the primary campaign; and had no real input into the campaign committee. The complaints in the present

proceeding relate to the general election campaign.

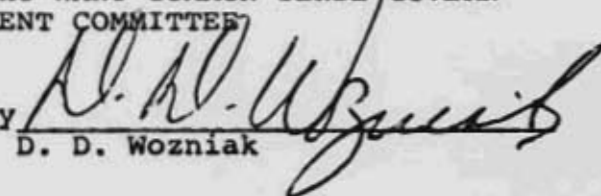
Finally, the General Counsel states that Brian Short, Mr. Short's son, "acted as treasurer" of Just a Bunch, while at the same time holding the position of campaign director to the Short committee. Statements like that are highly misleading, in light of the record. Wozniak was aware that Brian Short had absolutely nothing to do with Mr. Short's campaign. He was directly told that by Mr. Gates. Further, to our knowledge, Brian Short never participated in any decision-making of any nature whatsoever for either Committee.

Wozniak has essentially a one-man law office. He could not handle the nuts and bolts and mechanics of Just a Bunch, and was ignorant of the FEC rules and regulations. He merely asked and did receive from Brian Short the administrative and legal services necessary to comply with FEC rules and regulations. It is difficult to see where his performing legal and necessary house-keeping functions makes Just a Bunch guilty of anything. Wozniak, et al., made the decisions for Just a Bunch, not Brian Short.

IV. Conclusion.

This matter has already consumed far more attention and expense than it deserves. The complaints should be dismissed.

JUST A BUNCH OF PLAIN DFL FOLKS
WHO WANT COMMON SENSE GOVERN-
MENT COMMITTEE

BY 
D. D. Wozniak

DATED: June 23, 1980.

RECEIVED

Acc'd
16/61

30 JUN 16 AM 9:10

Auto Offices

D. D. Wozniak

401 Midwest Federal Building, St. Paul, Minnesota 55101

(612) 227-3434

D. D. Wozniak

Edward J. Cleary
Associate

008420

June 10, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

In Re: MUR 812

Dear Mr. Steele:

Your letter of June 2, 1980 arrived June 9th, and I am deeply appreciative for the continuance. To take care of one inadvertent mistake I submit the following:

As part of its termination as an active association JAB decided to close out its bank account by donating \$420.91 to the University of Notre Dame. However, that account check, thankfully, was never issued.

Recently, we received a refund in the amount of \$722.50 from a radio station which apparently had failed to run some of our campaign spots.

Thus, at present, there is a balance of \$1,143.31 in our account at the Bank of Minneapolis & Trust Company.

You know more than I do about that mix up involving the JFP bill which was apparently paid by the Short for Senate Committee. I understand that the principal campaign committee inadvertently paid a JFP bill in the amount of \$3,004.01 which should have been sent to us. As I believe you understand, that bill was never sent to us but apparently was sent directly to the Short Committee and, in the post election confusion, paid by it.

We recognize that JAB has a \$3004.01 obligation to JFP. I have enclosed a photocopy of a JAB check in the amount of \$1,143.41 payable to JFP. As soon as this check is cashed, JAB will be without resources. However, we fully intend to take care of the balance of this bill as soon as possible.

Please consider this letter an amendment to our termination

85040411318

Mr. Charles N. Steele
June 10, 1980
Page Two.

Lab Offices
D. D. Wozniak

report and have it filed accordingly. I am sure you realize that going through the motions of formally amending our report would be unduly burdensome. In addition, you have subpoenaed all of our records so it is impossible to do anything more than this now.

Sincerely,

D. D. Wozniak
D. D. WOZNIAK,
Chairman

DDW:gaj

Enclosure

cc: Frank Walz, Esq.
Brian Short

P. S. My brief will be in w/in 2 weeks

33040411319

525

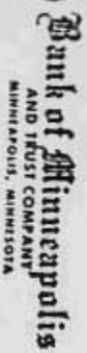
May 26, 1980

17-112
x 910

JFP & Associates

\$1,143.41

One Thousand One Hundred Forty Three and 41/100-dollars



AND TRUST COMPANY
MINNEAPOLIS, MINNESOTA

0526 9101 2700 3100 0900

330404113:0

Auto Offices

A. D. Nozniak

401 Midwest Federal Building

Saint Paul, Minnesota 55101

3 8 0 4 0 4 1 1

First Class Mail



**Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463**

83040111532



RETURN TO: ROBERT ROSENBERG

CERTIFIED

No. 491271

MAIL

FIRST CLASS MAIL

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

ASS MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1980

Randall E. Johnson
3700 W. 104th Street
Bloomington, MD 55431

Dear Mr. Johnson:

This is in response to your letter of June 13, 1980, in which you request information pertaining to the October 31, 1978, complaint filed by Paul Overgaard with the Commission.

As previously indicated to you, I am unable to accommodate your request. As you are aware, 2 U.S.C. § 437g(12)(A) (formerly § 437g(a)(3)), prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. Since no such agreement has been made, I am not in a position to provide you with any information at this time.

You will, of course, be informed of the final disposition of this matter as appropriate.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele", is written over the typed name and title.

Charles N. Steele
General Counsel

8304041132

RANDALL E. JOHNSON
Attorney-at-Law
3700 W. 104th STREET
BLOOMINGTON, MINNESOTA 55431
(612) 835-2651

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ADMITTED IN
MINNESOTA AND
DISTRICT OF COLUMBIA

June 13, 1980

Mr. Charles N. Steele
Mr. Tom Whitehead
Ms. Suzanne Callahan
Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, DC 20463

008496

Dear Charlie, Tom, and Suzanne:

One year and seven months ago my client, Mr. Paul Overgaard, filed a complaint against U.S. Senate candidate Bob Short and his affiliated committees.

While I readily recognize the burdens under which you all must labor, one year and seven months is a long time to prosecute a straightforward violation of the Act.

I am sure that it is unnecessary for me to remind you that the United States District Court for the District of Columbia pointedly told the FEC in Common Cause vs. FEC (No. 78-2135, April 30, 1980) that had not some conciliation agreements been entered into, "the court would undoubtedly find the conduct of the investigation contrary to law" because of "the inordinate length of time consumed by this investigation."

If the respondents are being cooperative, this matter certainly should have been concluded by now. If the respondents have not been cooperative, I cannot understand why you have not either filed suit to compel discovery in the District of Minnesota or named them as defendants in a civil suit alleging violations of the Act.

Unless I receive a satisfactory response from you I have been directed to follow the lead of Common Cause in the AMPAC case and bring action against the FEC for failure to act and investigate "expeditiously."

Please note my new address and send future communications about this matter to my attention.

Very truly yours,

17:01A

RANDALL E. JOHNSON

REJ:mlm

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FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

626 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

AREA CODE 612
TELEPHONE 332-0337

May 7, 1980

Charles N. Steele, Esq.
General Counsel, Federal Election
Commission
1325 K Street Northwest
Washington, DC 20463

RE: MUR 812

Dear Mr. Steele:

Enclosed herewith for your consideration in the above
matter please find three copies of our Brief in reply to the
Brief which you have submitted to the Commission.

Sincerely,

FOSTER, JENSEN & SHORT

Thomas H. Jensen

THOMAS H. JENSEN

THJ: ljr
Enc.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

Employees of Bob Short
Companies Committee

MUR 812
BRIEF OF THE COMMITTEE

INTRODUCTION

The question at issue in this matter is whether sufficient grounds exist for a finding by the Commission of probable cause to believe that the Employees of Bob Short Companies Committee (hereinafter "the Committee") has violated the provisions of 2 U.S.C. §§ 434(b) and 441(a).

On April 25, 1980, the Commission's General Counsel served upon the undersigned a Brief wherein he makes the argument that Committee expenditures were not independent in nature and urges the Commission to make a finding of probable cause. This Brief is submitted in response to that of the General Counsel and in support of the Committee's position that its expenditures were in fact independent expenditures pursuant to the provisions of 2 U.S.C. § 431(17).

PROCEDURAL HISTORY

Insofar as pertinent to the issues now under consideration by the Commission, the procedural history of this matter is as follows:

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1. October 30, 1978; November 1, 1978 -- Advertisements placed in the Minneapolis Star (October 30) and the Minneapolis Tribune (November 1) by the Committee. The same advertisement was placed in the St. Paul Pioneer Press on October 31, 1978 and in the St. Paul Dispatch on November 2, 1978. The total expenditures for the placement of the Committee's advertisement in the four newspapers amounted to Four Thousand Two Hundred Twenty-Six Dollars and Ninety-Six Cents (\$4,226.96). (See letter from the late Mr. Oscar Molomot, Committee Chairman, to Ms. Suzanne Callahan, Federal Election Commission staffmember, dated January 3, 1979).

2. October 31, 1978 -- Complaint filed with the Commission by Mr. Paul Overgaard alleging, among other things, that the Committee was not an independent committee within the meaning of the Federal Election Campaign Act (hereinafter "the Act").

3. December 20, 1978 -- Commission issues its finding that the matters contained in the Overgaard Complaint may have stated violations of 2 U.S.C. §§ 434(b); 433; 441a; 441d; and 11 C.F.R § 110.9(a). (See, letter from William C. Oldaker, Esq., to Mr. Molomot, dated December 2, 1978). As a result of its investigation, the Commission later found no reasonable cause to believe the Committee had violated the provisions of 2 U.S.C. § 441d or 11 C.F.R. § 110.9(a), and also determined to take no action with respect to the alleged violation of 2 U.S.C. § 433.

4. December 21, 1978 -- Certain written Interrogatories are served on Mr. Molomot. Responses thereto submitted by Mr. Molomot on January 3, 1979. (See letter from Mr. Molomot to Ms. Suzanne Callahan, dated January 3, 1979).

5. February 13, 1979 -- Additional written Interrogatories served on Mr. Molomot. Responses thereto submitted on March 12, 1979. (See letter from Mr. Molomot to William C. Oldaker, Esq., dated March 12, 1979).

6. April 12, 1979 -- Mr. Molomot is deposed by Thomas J. Whitehead, Esq., Assistant General Counsel of the Commission.

STATEMENT OF THE CASE

As the General Counsel notes in his Brief, the Committee was formed in October, 1978 through the efforts of a number of persons employed by corporations owned by Mr. Robert Short, who was then a candidate for election to the United States Senate. This was done at the initiative of Mr. Oscar Molomot, after several employees had expressed concern to him that Mr. Short's record as an employer and supporter of organized labor had been inaccurately portrayed in the media. ^{1/}

The Committee's sole activity designed expressly to

^{1/} Deposition of Oscar Molomot (hereinafter "Molomot Deposition") at 5,7; letter from Molomot to Callahan, January 13, 1979, at p. 1.

advocate the candidacy of Mr. Short consisted in placing advertisements ^{2/} in the Minneapolis and St. Paul morning and evening newspapers. ^{3/} The Chairman of the Committee was the late Mr. Molomot of Minneapolis, Minnesota. ^{4/}

The funds raised by the Committee amounted to \$4,425.00. Contributions to the Committee were made on a strictly voluntary basis by a number of employees. The total cost of the newspaper advertisements (including key-lining and reprints) was \$4,226.96. The surplus of \$198.04 was donated by the Committee to the United Way of Minneapolis, a non-profit, charitable organization.

^{2/} The identical advertisement was placed in each of the four newspapers. A copy of the advertisement was introduced as an exhibit to the Molomot Deposition and should therefore be on file with the Commission.

^{3/} The advertisement was not authorized by Mr. Short, his principal campaign committee, or any agent of either. We note that the Commission has already determined that no grounds exist in this matter which support the allegation that the advertisement constituted a violation of 2 U.S.C. § 441d.

^{4/} Mr. Molomot died on December 4, 1979. The Office of the Commission's General Counsel was informed of this fact by letter from the undersigned dated December 10, 1979.

LEGAL ANALYSIS

Introduction:

The Committee's expenditures were in fact independent expenditures within the meaning of the Act.

Mr. Molomot was reimbursed by the principal campaign committee for certain unrelated, out-of-pocket expenses incurred by him prior to formation of the Committee. ^{5/} Likewise, there is no dispute that Mr. Molomot's employer, Admiral Merchants Motorfreight, Inc., was reimbursed for time Mr. Molomot spent away from his employment while performing certain services for the principal campaign committee, which made the salary

^{5/} The nature and amount of these reimbursements were the subject of testimony by Mr. Molomot at his deposition. See, Molomot Deposition at 12-14. As the Commission will note, the reimbursements resulted from four out-of-pocket expenditures made by Mr. Molomot, none of which was in any way related to the Committee itself or any Committee activities.

As Mr. Molomot (in response to questions by his counsel) testified at his deposition:

Q: Oscar, you testified about certain reimbursements that you received from the principal committee. Did the fact that you were getting reimbursements effect [sic] your judgment at all about how to go about your independent committee?

A: No.

Q: As far as --

A: They were totally unrelated.

Molomot Deposition at 33.

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reimbursements to Admiral Merchants.^{6/} However, the General Counsel's argument that these circumstances negate the independent nature of the Committee's expenditures is made without any reference to important facts contained in the record now before the Commission. His argument cannot withstand scrutiny in the light of the entire record and should be rejected by the Commission.

The Act provides that an "independent expenditure" is:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

2 U.S.C. § 431(17).

^{6/} The Overgaard Complaint in this matter was based only on the expense reimbursement issue. In addition, the Commission's determination of "reason to believe" a violation of 2 U.S.C. § 434(b) had occurred was based solely on the expense reimbursement question. (See letter from Oldaker to Molomot, dated December 21, 1978). Therefore, the General Counsel's belated reliance on the matter of salary reimbursement is somewhat surprising to us.

In any event, it is difficult to see how reimbursement to a third party (Admiral Merchants) can in any realistic sense be viewed as reimbursement or compensation to Mr. Molomot. Moreover, since Mr. Molomot was a salaried executive and did not "punch a clock," if the principal campaign committee had not made such reimbursement, the argument could have been made that Admiral Merchants was making a corporate contribution to the campaign in the amount of unreimbursed salary paid by it to Mr. Molomot. The obvious and justifiable purpose for the salary reimbursement was to avoid arguable violation of 2 U.S.C. § 441b.

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Mr. Molomot was deposed by the Commission's Assistant General Counsel on April 12, 1979. During the course of the deposition Mr. Molomot was interrogated on all aspects of the Committee's operations. His forthright responses to the questions of the Assistant General Counsel should go far in assisting the Commission in its deliberations; the deposition testimony is the best evidence of the true nature of the Committee's expenditures and leads ineluctably to the conclusion that the expenditures were independent.

For example (all questions below were propounded by Assistant General Counsel Whitehead):

Q: According to the information that you supplied to the Commission, you contacted Mr. Short to tell him of the Committee's plans; is that right?

A: Not of the Committee's plans. In mid-October I saw Mr. Short, and I wanted [him to know] -- there was -- were a number of employees who thought that we should answer some of the unfair comments in print and over the radio, audio, and they didn't know how to go about it, and I thought we'd organize a committee or try to, and I recall him saying, advising us not to because, in his own words, "What good would it do?"

And that's the only contact I ever had with Mr. Short that relates to the Committee.

Molomot Deposition at 7 (emphasis added).

Mr. Whitehead also asked:

Q: Did you ever show Mr. Short any of the proposed advertising or media scripts or anything that you proposed to use?

A: No.

Molomot Deposition at 7-8. Further:

Q: Did you ever talk to him about the proposed material that you'd be using?

A: No.

Q: Did you ever solicit any opinions or advice about the campaign from Mr. Short?

A: No.

Molomot Deposition at 8. And:

Q: Did you spend any time at the principal campaign headquarters?

A: No.

Q: Were you ever advised of what the campaign strategy was?

A: No.

Q: Did you ever attend any meetings of the principal campaign committee?

A: No.

Q: Okay. Did you ever prepare any issue statements for the principal campaign committee?

A: No.

Q: And did you ever read any issue statements for the principal campaign committee that were given to you for reading?

A: No.

Molomot Deposition at 16-17.

More to the same effect could be quoted from the direct examination in the Molomot Deposition, which is on file with the Commission. The point is that neither Oscar Molomot nor anyone else involved with the Committee acted in "cooperation or consultation" or "in concert with, or at the request or suggestion of" Mr. Short, the principal campaign committee, or

any agent of either. As Mr. Molomot summarized in response to a question by his counsel:

Q: Oscar, was there ever anything that you did in connection with this independent committee that you, in your mind, would indicate in any respect that Mr. Short, his principal committee or anyone involved with it had any degree at all of control over that committee?

A: They had no control whatsoever, and October 18th, when there was this response from our general managers and our salesmen, we just decided that regardless of what Mr. Short thought, we would go ahead with this project. They had absolutely nothing to do with what I wrote in copy. They were never conferred with as it relates to when we would insert it. I just used my own advertising judgments in all these respects.

Molomot Deposition at 31-32.

The General Counsel's Argument Should be Rejected by the Commission.

The General Counsel relies entirely on the presumption set forth in 11 C.F.R. § 109.1 (b)(4)(1)(B) to support his position before the Commission. ^{7/} He surely cannot mean, however, that the out-of-pocket expense reimbursement to Mr. Molomot and salary reimbursement to his employer "... sustain the presumption that the expenditures for the Employees Committee advertisements were not independent." (Brief of General Counsel at p. 3; emphasis added). Logic would seem to indicate that even given

^{7/} The regulation states that an expenditure will be presumed not to be independent where it is made by or through a person "... who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent. ..."

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the General Counsel's position, such considerations (or at least the matter of out-of-pocket expense reimbursement, cf. note 6, supra) may bring the "presumption" into play; whether or not it is "sustained" is a different question depending for its resolution on an examination of all the facts of this case, not just those from which the General Counsel chooses to argue. ^{8/}

There is significant evidence in the record which shows that the Committee's expenditures were in fact independent. Mr. Molomot's deposition testimony clearly provides the most reliable evidence available of the independent nature of the Committee's expenditures. Indeed, it is now the only direct evidence which the Commission will ever be able to obtain on the question of the independent nature of the expenditures. We submit that such evidence, especially when viewed in light of Mr. Molomot's willing cooperation with the General Counsel's investigation, leaves no room for a conclusion other than that the expenditures of the Committee were independent expenditures.

It is firmly established that in cases, as here, where a fact-finding body is faced with evidence which tends to negate a presumption, the presumption loses any special probative

^{8/} We are willing to assume, for the purposes of argument only, that the pertinent language of 11 C.F.R. § 109.1 (b)(4)(i)(B) states a true and valid presumption-of-law. Whether this actually is the case is, in our opinion, arguable and we do not wish to give the Commission the impression that we acknowledge that the regulation states a valid presumption.

value which it might otherwise possess. See generally, Legille v. Dann, 544 F.2d 1, (D.C. Cir. 1976); Fed. R. Evid. 301; 9 Wigmore, Evidence § 2491 (3d Ed. at p. 289).^{2/}


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The facts on which the General Counsel relies provide but a thin reed of support for his argument and recommendation to the Commission. The direct evidence of the independent nature of the Committee's expenditures provided by Mr. Molomot, both in his deposition and his correspondence with the Office of the General Counsel, is significant and compelling. The "presumption" on which the General Counsel rests his case has not been "sustained;" it has no independent significance and provides insufficient grounds to support a finding of "probable cause." The facts, viewed in their entirety, point in a direction opposite from that taken by the General Counsel.

CONCLUSION

For all the foregoing reasons, the Commission should enter a finding of no probable cause and, accordingly, dismiss the Complaint in this matter.

Respectfully submitted,

FOSTER, JENSEN & SHORT


Thomas H. Jensen
828 Midland Bank Building
401 Second Avenue South
Minneapolis, Minnesota 55401
612/332-0337

Attorneys for the Committee

^{2/} "Presumptions ... may be looked on as the bats of the law, flitting in the twilight, but disappearing in the light of actual facts." Legille v. Dann, 544 F.2d 1, 6 (D.C. Cir. 1976), quoting from Stumpf v. Montgomery, 101 Okl. 257, 226 P. 65 (1924).

Charles N. Steele, Esq.
General Counsel, Federal
Election Commission
1325 K Street Northwest
Washington, DC 20463

BEFORE THE FEDERAL ELECTION COMMISSION
April 4, 1980

In the Matter of)
Employees of Bob Short)
Companies Committee)

MUR 812

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 20, 1979, the Commission, based upon a notarized complaint filed by Paul Overgaard, found reason to believe that the Employees of Bob Short Companies Committee ("Employees Committee") may have violated 2 U.S.C. §§ 433, 434(b), 441a, 11 C.F.R. 110.9(a) and 441d.

An investigation was conducted and on November 14, 1979, the Commission determined it would take no further action with regard to the Committee's violation of 2 U.S.C. §433 and found no reasonable cause to believe violations of 11 CFR 110.9 (a) and §441d had been committed.

The Office of General Counsel's findings with respect to the Committee's violations of §434(b) and §441a are discussed below.

II. Legal Analysis

Independent Expenditure Status:

Since the Commission findings in connection with §434(b) and §441a, are contingent upon whether or not Employees Committee

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is independent within the meaning of the Act and Regulations; the independent expenditure status of the group is addressed separately below.

The evidence indicates that the Employees Committee was formed by employees of candidate Short to portray Mr. Short as a trustworthy, reliable, and reasonable employer; Molomot conceived of the idea of placing an ad in the local press. The plan was to have employees of Short companies contribute funds, voluntarily, to pay for advertisements in support of the candidate.

The disclaimer contained in the advertisements placed by the Employees Committee indicates that it was not authorized by candidate Short. The complainant alleges that because Oscar Molomot was reimbursed for expenses by the principal campaign committee, SSCV, the expenditure for the advertisement could not have been independent.

11 C.F.R. 109.1, as it applies in the instant matter, defines independent expenditures to mean:

"... an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of a candidate or any agent or authorized committee of such candidate." 11 C.F.R. 109.1(a)

"Made with the cooperation..." (11 C.F.R. 109.1(b)(4)) is defined to mean:

"Any arrangement, coordination or direction by the candidate or his or her agent prior to the publication, distribution, display, or broadcast of the communication. An expenditure will be presumed to be made when it is ...

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"Made by ... any person ... who is, or has been receiving any form of compensation or reimbursement from the ... candidate's committee...." 11 C.R.F. 109.1(b)(1)(B).

Thus, where a candidate's committee compensates any person who makes an expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate prior to dissemination of the communication, it is presumed that the expenditure is made with the cooperation or with the prior consent of, or in consultation with, or at the suggestion of a candidate or any authorized committee of the candidate and is not independent.

The evidence gathered during the course of our investigation indicates that: 1) Oscar Molomot received \$382 in reimbursements for out-of-pocket expenses from the principal campaign committee, and 2) SSVC reimbursed Molomot's employer for that portion of Molomot's salary for his time spent on campaign related business during working hours. Molomot spent approximately 60% of his time on campaign business during working hours in April 1978, and 5% in May and June. All additional work time which Molomot spent campaigning was billed by the hour to the principal campaign committee by Molomot's employer. Because Molomot personally received reimbursement for out-of-pocket expenses and his employer was compensated by the principal campaign committee, these facts sustain the presumption that the expenditure for the Employees Committee advertisements were not independent.

§ 434

Since the expenditures by Employees Committee are not independent within the meaning of the Act, the Committee's expenditures should be considered in-kind contributions to Short's campaign and should have been reported accordingly. Employees Committee's failure to report its financial activity in accordance with 2 U.S.C. § 434 places it in violation of that section. Therefore, it is recommended that the Commission find probable cause to believe a violation of 2 U.S.C. § 434(b) has been committed by the Employees Committee.


§ 441a:

Additionally, since the committee's expenditures in the amount of \$4,227 are considered in-kind contributions under the Act, the committee has exceeded the contribution limitations of § 441a. It is recommended that the Commission find probable cause to believe a violation of 2 U.S.C. § 441a has been committed by the Employees Committee.

III. Recommendation

1. Find probable cause to believe that the Employees of Bob Short Companies Committee has violated 2 U.S.C. §§ 434(b) and 441a.

21 April 1980
Date


Charles N. Steele
General Counsel

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

AREA CODE 612
TELEPHONE 332-0337

May 7, 1980

Charles N. Steele, Esq.
General Counsel, Federal Election
Commission
1325 K Street Northwest
Washington, DC 20463

RE: MUR 812

Dear Mr. Steele:

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Sincerely,

FOSTER, JENSEN & SHORT

Thomas H. Jensen

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MUR 812
BRIEF OF THE COMMITTEE

INTRODUCTION

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PROCEDURAL HISTORY

Insofar as pertinent to the issues now under consideration by the Commission, the procedural history of this matter is as follows:

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3. December 20, 1978 -- Commission issues its finding that the matters contained in the Overgaard Complaint may have stated violations of 2 U.S.C. §§ 434(b); 433; 441a; 441d; and 11 C.F.R § 110.9(a). (See, letter from William C. Oldaker, Esq., to Mr. Molomot, dated December 2, 1978). As a result of its investigation, the Commission later found no reasonable cause to believe the Committee had violated the provisions of 2 U.S.C. § 441d or 11 C.F.R. § 110.9(a), and also determined to take no action with respect to the alleged violation of 2 U.S.C. § 433.

4. December 21, 1978 -- Certain written Interrogatories are served on Mr. Molomot. Responses thereto submitted by Mr. Molomot on January 3, 1979. (See letter from Mr. Molomot to Ms. Suzanne Callahan, dated January 3, 1979).

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The Committee's sole activity designed expressly to

^{1/} Deposition of Oscar Molomot (hereinafter "Molomot Deposition") at 5,7; letter from Molomot to Callahan, January 13, 1979, at p. 1.

advocate the candidacy of Mr. Short consisted in placing advertisements ^{2/} in the Minneapolis and St. Paul morning and evening newspapers. ^{3/} The Chairman of the Committee was the late Mr. Molomot of Minneapolis, Minnesota. ^{4/}

The funds raised by the Committee amounted to \$4,425.00. Contributions to the Committee were made on a strictly voluntary basis by a number of employees. The total cost of the newspaper advertisements (including key-lining and reprints) was \$4,226.96. The surplus of \$198.04 was donated by the Committee to the United Way of Minneapolis, a non-profit, charitable organization.

^{2/} The identical advertisement was placed in each of the four newspapers. A copy of the advertisement was introduced as an exhibit to the Molomot Deposition and should therefore be on file with the Commission.

^{3/} The advertisement was not authorized by Mr. Short, his principal campaign committee, or any agent of either. We note that the Commission has already determined that no grounds exist in this matter which support the allegation that the advertisement constituted a violation of 2 U.S.C. § 441d.

^{4/} Mr. Molomot died on December 4, 1979. The Office of the Commission's General Counsel was informed of this fact by letter from the undersigned dated December 10, 1979.

LEGAL ANALYSIS

Introduction:

The Committee's expenditures were in fact independent expenditures within the meaning of the Act.

Mr. Molomot was reimbursed by the principal campaign committee for certain unrelated, out-of-pocket expenses incurred by him prior to formation of the Committee. ^{5/} Likewise, there is no dispute that Mr. Molomot's employer, Admiral Merchants Motorfreight, Inc., was reimbursed for time Mr. Molomot spent away from his employment while performing certain services for the principal campaign committee, which made the salary

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Q: Oscar, you testified about certain reimbursements that you received from the principal committee. Did the fact that you were getting reimbursements effect [sic] your judgment at all about how to go about your independent committee?

A: No.

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A: They were totally unrelated.

Molomot Deposition at 33.

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2 U.S.C. § 431(17).

^{6/} The Overgaard Complaint in this matter was based only on the expense reimbursement issue. In addition, the Commission's determination of "reason to believe" a violation of 2 U.S.C. § 434(b) had occurred was based solely on the expense reimbursement question. (See letter from Oldaker to Molomot, dated December 21, 1978). Therefore, the General Counsel's belated reliance on the matter of salary reimbursement is somewhat surprising to us.

In any event, it is difficult to see how reimbursement to a third party (Admiral Merchants) can in any realistic sense be viewed as reimbursement or compensation to Mr. Molomot. Moreover, since Mr. Molomot was a salaried executive and did not "punch a clock," if the principal campaign committee had not made such reimbursement, the argument could have been made that Admiral Merchants was making a corporate contribution to the campaign in the amount of unreimbursed salary paid by it to Mr. Molomot. The obvious and justifiable purpose for the salary reimbursement was to avoid arguable violation of 2 U.S.C. § 441b.

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For example (all questions below were propounded by Assistant General Counsel Whitehead):

Q: According to the information that you supplied to the Commission, you contacted Mr. Short to tell him of the Committee's plans; is that right?

A: Not of the Committee's plans. In mid-October I saw Mr. Short, and I wanted [him to know] -- there was -- were a number of employees who thought that we should answer some of the unfair comments in print and over the radio, audio, and they didn't know how to go about it, and I thought we'd organize a committee or try to, and I recall him saying, advising us not to because, in his own words, "What good would it do?"

And that's the only contact I ever had with Mr. Short that relates to the Committee.

Molomot Deposition at 7 (emphasis added).

Mr. Whitehead also asked:

Q: Did you ever show Mr. Short any of the proposed advertising or media scripts or anything that you proposed to use?

A: No.

Molomot Deposition at 7-8. Further:

Q: Did you ever talk to him about the proposed material that you'd be using?

A: No.

Q: Did you ever solicit any opinions or advice about the campaign from Mr. Short?

A: No.

Molomot Deposition at 8. And:

Q: Did you spend any time at the principal campaign headquarters?

A: No.

Q: Were you ever advised of what the campaign strategy was?

A: No.

Q: Did you ever attend any meetings of the principal campaign committee?

A: No.

Q: Okay. Did you ever prepare any issue statements for the principal campaign committee?

A: No.

Q: And did you ever read any issue statements for the principal campaign committee that were given to you for reading?

A: No.

Molomot Deposition at 16-17.

More to the same effect could be quoted from the direct examination in the Molomot Deposition, which is on file with the Commission. The point is that neither Oscar Molomot nor anyone else involved with the Committee acted in "cooperation or consultation" or "in concert with, or at the request or suggestion of" Mr. Short, the principal campaign committee, or

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any agent of either. As Mr. Molomot summarized in response to a question by his counsel:

Q: Oscar, was there ever anything that you did in connection with this independent committee that you, in your mind, would indicate in any respect that Mr. Short, his principal committee or anyone involved with it had any degree at all of control over that committee?

A: They had no control whatsoever, and October 18th, when there was this response from our general managers and our salesmen, we just decided that regardless of what Mr. Short thought, we would go ahead with this project. They had absolutely nothing to do with what I wrote in copy. They were never conferred with as it relates to when we would insert it. I just used my own advertising judgments in all these respects.

Molomot Deposition at 31-32.

The General Counsel's Argument Should be Rejected by the Commission.

The General Counsel relies entirely on the presumption set forth in 11 C.F.R. § 109.1 (b)(4)(i)(B) to support his position before the Commission. ^{7/} He surely cannot mean, however, that the out-of-pocket expense reimbursement to Mr. Molomot and salary reimbursement to his employer "... sustain the presumption that the expenditures for the Employees Committee advertisements were not independent." (Brief of General Counsel at p. 3; emphasis added). Logic would seem to indicate that even given

^{7/} The regulation states that an expenditure will be presumed not to be independent where it is made by or through a person "... who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent. ..."

the General Counsel's position, such considerations (or at least the matter of out-of-pocket expense reimbursement, cf. note 6, supra) may bring the "presumption" into play; whether or not it is "sustained" is a different question depending for its resolution on an examination of all the facts of this case, not just those from which the General Counsel chooses to argue. ^{8/}

There is significant evidence in the record which shows that the Committee's expenditures were in fact independent. Mr. Molomot's deposition testimony clearly provides the most reliable evidence available of the independent nature of the Committee's expenditures. Indeed, it is now the only direct evidence which the Commission will ever be able to obtain on the question of the independent nature of the expenditures. We submit that such evidence, especially when viewed in light of Mr. Molomot's willing cooperation with the General Counsel's investigation, leaves no room for a conclusion other than that the expenditures of the Committee were independent expenditures.

It is firmly established that in cases, as here, where a fact-finding body is faced with evidence which tends to negate a presumption, the presumption loses any special probative

^{8/} We are willing to assume, for the purposes of argument only, that the pertinent language of 11 C.F.R. § 109.1 (b)(4)(1)(B) states a true and valid presumption-of-law. Whether this actually is the case is, in our opinion, arguable and we do not wish to give the Commission the impression that we acknowledge that the regulation states a valid presumption.

value which it might otherwise possess. See generally, Legille v. Dann, 544 F.2d 1, (D.C. Cir. 1976); Fed. R. Evid. 301; 9 Wigmore, Evidence § 2491 (3d Ed. at p. 289).^{2/}

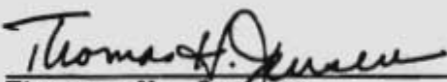
The facts on which the General Counsel relies provide but a thin reed of support for his argument and recommendation to the Commission. The direct evidence of the independent nature of the Committee's expenditures provided by Mr. Molomot, both in his deposition and his correspondence with the Office of the General Counsel, is significant and compelling. The "presumption" on which the General Counsel rests his case has not been "sustained;" it has no independent significance and provides insufficient grounds to support a finding of "probable cause." The facts, viewed in their entirety, point in a direction opposite from that taken by the General Counsel.

CONCLUSION

For all the foregoing reasons, the Commission should enter a finding of no probable cause and, accordingly, dismiss the Complaint in this matter.

Respectfully submitted,

FOSTER, JENSEN & SHORT


Thomas H. Jensen
828 Midland Bank Building
401 Second Avenue South
Minneapolis, Minnesota 55401
612/332-0337

Attorneys for the Committee

^{2/} "Presumptions ... may be looked on as the bats of the law, flitting in the twilight, but disappearing in the light of actual facts." Legille v. Dann, 544 F.2d 1, 6 (D.C. Cir. 1976), quoting from Stumpf v. Montgomery, 101 Okl. 257, 226 P. 65 (1924).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak
401 Midwest Federal Building
St. Paul, MN 55101

Re: MUR 812

Dear Mr. Wozniak:

This is in response to your letter of May 1, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On May 29, 1980, the Commission voted to deny your request for an extension until June 15th. However, in light of your court commitments, the Commission has voted to grant you an extension of two weeks, from the date of your receipt of this notification, in which to file a responsive brief.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

33040411333



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak
401 Midwest Federal Building
St. Paul, MN 55101

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Sincerely,

Charles N. Steele
General Counsel

Smc
5/20/80

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812
Folks Who Want Common)
Sense Government Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 29, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 812:

1. Deny Wozniak's request for an extension of time in which to file a responsive brief until June 15, 1980.
2. Approve a two week extension for the filing of responsive brief.
3. Send the notification letter as attached to the Memorandum to the Commission dated May 27, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

5/30/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 5-27-80, 10:50
Circulated on 48 hour vote basis: 5-27-80, 4:00

83040411356

May 27, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Janee Colgrove
SUBJECT: MUR 812

Please have the attached Memo to the Commission on MUR 812 distributed to the Commission on a 48 hour tally basis.

Thank you.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

RECEIVED
OFFICE OF THE
CLERK OF THE SECRETARY

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May 27, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 812 - Request for an extension of time

On May 5, 1980, the Office of General Counsel received a request from Donald Wozniak for an extension of time in which to file a responsive brief in connection with MUR 812, the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee.

Wozniak's letter indicates that he is "actively engaged in trial" until June 2, 1980, and will be unable to submit a brief until June 15, 1980. Wozniak would like an opportunity to respond since he feels the General Counsel's Brief contains factual and legal errors. Wozniak's 15 day time period in which to file a brief expires on May 13th.

While this office feels that a one month extension request is excessive, it is recommended that Wozniak be granted a two week extension in light of his prior court commitments which cannot be changed.

Recommendations

It is recommended that the Commission:

1. Deny Wozniak's request for an extension of time in which to file a responsive brief until June 15, 1980;
2. Approve a two week extension for the filing of responsive brief; and
3. Send attached notification letter.

Attachments

Wozniak's letter of May 1, 1980
Proposed notification letter

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GCC #1237 Callahan
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'80 MAY '5 PM 1:21

Tab Officers
D. D. Wozniak

401 Midwest Federal Building, St. Paul, Minnesota 55101
(612) 227-9494

D. D. Wozniak

Edward J. Cleary
Associate

May 1, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

007872

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 812/853

Dear Mr. Steele:

On April 28, 1980, I received your letter of April 21st. I am actively engaged in trial since we are ending our term with my last case scheduled for trial on June 2nd, 1980.

Because of this, I am unable to submit my brief within the 15 days which you have requested, and I respectfully request an extension until June 15, 1980.

This is important to me since I feel there exist errors in both Fact and Law in your brief.

Thank you for your anticipated courtesy in this matter.

Very truly yours,

D. D. Wozniak
D. D. WOZNIAK

DDW:gaj

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak
401 Midwest Federal Building
St. Paul, MN 55101

Re: MUR 812

Dear Mr. Wozniak:

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Sincerely,

Charles N. Steele
General Counsel

33040411360

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WILLIAM E. FLYNN
RANDOLPH J. MAYER

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL**
F. JAVIER FABREGAT*

May 12, 1980

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Gentlemen:

Enclosed please find ten (10) copies of the
Respondent's Brief in the above-entitled matter.

Three (3) additional copies of the Brief are
being forwarded to the General Counsel.

Yours very truly,

Frank J. Walz

FJW:emw

enclosures

cc: Mr. Charles N. Steele w/encs.

007994

61:218 11/11/80

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF

SHORT FOR SENATE COMMITTEE
OF VOLUNTEERS

)
)
)
)
)

MUR 812

BRIEF OF THE RESPONDENT

I. STATEMENT OF THE CASE

This MUR was commenced in November 1978. It was the subject of extensive discovery and investigation by the General Counsel during the spring and summer of 1979.

On September 15, 1979 the respondent Short for Senate Committee of Volunteers ("Committee") submitted a letter-brief in support of its position. [A copy of the letter-brief is attached as Exhibit 1.] In a letter of the same date, the Committee supplied additional information concerning the Committee's inadvertent payment of a November 6, 1978 invoice from J.F.P and Associates, Inc. ("J.F.P.") to the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("Just a Bunch Committee"). [A copy of the letter and its enclosure is

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attached as Exhibit 2.]

By letter dated September 28, 1979, the General Counsel requested that Brian Short answer additional questions under oath concerning his involvement with the Just a Bunch Committee and concerning the misdirected J.F.P. invoice. [A copy of the General Counsel's letter and its enclosures is attached as Exhibit 3.]

On October 8, 1979, the Committee supplied additional information concerning J.F.P. and forwarded Brian Short's affidavit responding to the questions received from the General Counsel. [A copy of the letter, with its enclosures, is attached as Exhibit 4.]

By letter dated December 31, 1979, the General Counsel advised the Committee of the Commission's initial action. [A copy of the letter is attached as Exhibit 5.]

Shortly thereafter, the 1979 amendments to the Federal Election Campaign Act became effective. As a result, the matter is being resubmitted to the Commission under the revised enforcement procedures.

II. THE COMMITTEE'S POSITION

The Committee's position on the "independent" nature of the expenditures of the Just a Bunch Committee and the Employees of Bob Short Companies Committee

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("Employees Committee") is fully stated in its prior submission [Exhibit 1]. Its position on the payment-in-error of the J.F.P. invoice is outlined in the prior correspondence with the General Counsel [Exhibits 2-4].

The Committee does not intend to amend its reports to reflect the receipt of in-kind contributions from the Just a Bunch and Employees Committees. The expenditures of those groups were wholly independent of the Committee, both factually and legally. The presumptions of non-independence which the General Counsel seeks to establish under the regulation, 11 C.F.R. § 109.1(b)(4), by reason of the Committee's occasional reimbursement of out-of-pocket expenses to Oscar Malomot (an officer of the Employees Committee), its payment for consulting services to Jim Rice (an officer of the Just a Bunch Committee) for mobilizing veterans' groups, and Brian Short's respective roles as "campaign director" [a title which did not carry significant duties] and counsel to the Committee, as well as counsel to the Just a Bunch Committee, were rebutted overwhelmingly by the evidence that none of these individuals, in their activities with the Just a Bunch and/or Employees Committees, acted in any way in cooperation or consultation with the Committee or its responsible officers,

or on its behalf as its authorized agent.*

We submit that the time has come for the General Counsel to acknowledge that the individuals who organized and administered the Employees Committee and the Just a Bunch Committee acted at their own urging, and, perhaps more importantly, that they had every legal and constitutional right to do what they did. Their actions, as such, imposed absolutely no obligation of any kind on the Committee to report their expenditures as in-kind contributions.

III. CONCLUSION

The complaint which initiated the present inquiry should be dismissed.

O'CONNOR & HANNAN

By 

Frank J. Walz

Thirty-Eighth Floor, IDS-Tower
80 South Eighth Street
Minneapolis, Minnesota 55402
612 341-3800

ATTORNEYS FOR RESPONDENT

DATED: May 12, 1980.

* We note a glaring error in the factual recitation in the General Counsel's brief. He states that "Wozniak, Popovich, Rice and Rolvaag were involved in a one-day tour of the state with Candidate Short." [G.C. Br. 6] It is our understanding that shortly after the Just a Bunch Committee was organized, the first four individuals named did make a one-day swing around the state to announce the organization and purpose of their committee. Mr. Short, however, did not accompany them on the tour.

O'CONNOR & HANNAN

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ROBERT A. BRUNIO

WILLIAM G. KELLY (1918-1970)

LOCAL COUNSEL
F. JAVIER FABREGAT

September 15, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

This letter is submitted on behalf of the Short for Senate Committee of Volunteers ("Short Committee"), as its discussion of the principal issues raised in the above inquiry relating to the alleged relationship of the Short Committee to unauthorized committees known as Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("Just a Bunch Committee"), and Employees of Bob Short Committee ("Employees Committee").

Procedural History

The inquiry was initiated upon the filing of a complaint letter by the Durenberger for U.S. Senate Committee dated October 31, 1978. The initial complaint was supplemented by a second letter complaint dated November 15, 1978.

By letters dated December 21, 1978, on behalf of the Federal Election Commission ("Commission"), you

Exhibit 1

Mr. William C. Oldaker
Page 2
September 15, 1979

advised the Short Committee and the candidate, Robert E. Short, of the complaint and provided them with copies of the complaint letters.

In your letter to the Short Committee, you indicated that the Commission had reason to believe that the matters alleged in the complaint letters stated violations by the Short Committee of the following statutes and regulations:

(1) Section 110.9(a) of the Commission's regulations, 11 C.F.R. § 110.9(a), by accepting contributions in excess of the limitations provided in the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 441a.

(2) 2 U.S.C. § 441b, by entering into a rental agreement for office space with the R. E. Short Company outside the ordinary course of business.

(3) 2 U.S.C. § 441b, by using corporate WATS lines for campaign purposes.

(4) 2 U.S.C. § 434(b), by not properly reporting the receipt of "in-kind" contributions.

The violations identified in paragraphs (1) and (4), you said, were premised on the Commission's "determination" that expenditures made in support of Mr. Short's campaign by the Just a Bunch Committee, and the Employees Committee, are not "independent", within the meaning of 2 U.S.C. § 431(p), and are therefore considered to be "in-kind" contributions to the Short campaign.

Both the Short Committee and Mr. Short submitted letter responses dated January 4, 1979. By letter dated March 23, 1979, the Short Committee also responded to your letter dated March 9, 1979, directed to Mr. Short, requesting further information. Thereafter, in April 1979, the Commission served deposition and document subpoenas on several of the individuals

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Mr. William C. Oldaker
Page 3
September 15, 1979

associated with the Short Committee, the Just a Bunch Committee and the Employees Committee.

Substantially all of the records of the Short Committee were subsequently made available to the Commission staff, and the staff completed its review and conducted the desired examination of witnesses, during the months of June and July.

Based upon the examination of documents and witnesses conducted by the Commission staff, it would appear that the staff had previously satisfied itself with respect to the alleged violations concerning the Short Committee's rental of office space from the R. E. Short Company and the Committee's use of WATS lines. We therefore do not propose to address those matters here, except to state the Short Committee's position that neither charge had any basis in fact.

That, in essence, is likewise our position with respect to the issues relating to expenditures by the Just a Bunch and Employees Committees, discussed herein.

Factual Background

As indicated in our letter of September 6, 1979, relating to MUR 818, Mr. Short announced his candidacy for the United States Senate in the spring of 1978, as a member of the Democratic Farmer Labor ("DFL") party in Minnesota. The Short Committee was created as Mr. Short's principal campaign committee shortly thereafter. Aside from the candidate authorization form signed on September 8, 1978 relating to the Democrats, Republicans and Independents United for a Pro-Life Senate Committee, no other committee was authorized by Mr. Short or the Short Committee to receive and expend funds in support of his candidacy, during either the primary or general election campaigns.

On September 12, 1978, Mr. Short defeated the endorsed DFL candidate, then-Congressman Donald Fraser, in the Democratic primary election. His Republican

83040411358

Mr. William C. Oldaker
Page 4
September 15, 1979

opponent in the general election, held on November 7, 1978, was David Durenberger, whose principal campaign committee filed the complaint letters precipitating the present inquiry.

As indicated in our previous submission, Fred L. Gates ("Gates") became Mr. Short's campaign manager on May 1, 1978. He was invested with, and exercised, full effective control and direction of the activities of the Short Committee.

Aside from a paid staff with assigned functions, and a number of honorary designations, the Committee's lines of authority essentially began and ended with Gates.

Early in the primary campaign, a volunteer committee of friends and influential supporters of the candidate was appointed, under the designation "advisory committee", for the purpose of obtaining broader participation in campaign planning and strategy. In fact, its impact was negligible, by reason of Gates' strong preference for exercising his own judgment in virtually all matters. The advisory committee held sporadic meetings during the primary campaign, but fizzled prior to the general election campaign, at least in part because of friction which developed between Gates and certain committee members, principally D. D. Wozniak ("Wozniak"), a St. Paul attorney, former state legislator and long-time personal friend of Mr. Short. Wozniak's political judgments consistently differed with Gates', particularly with respect to Wozniak's St. Paul constituency.

Brian Short, the candidate's son and a Minneapolis attorney, was also a member of the advisory committee. As a result of Gates' general lack of receptivity to the committee's functioning, Brian Short came to view his role as one of liaison, or perhaps more accurately, a buffer, between committee members and Gates.

In addition to his advisory committee function, at the outset of the campaign, Brian Short received the designation of campaign director, a volunteer

83040411339

Mr. William C. Oldaker
Page 5
September 15, 1979

post without any substantive duties. He likewise was a necessary co-signer of the Short Committee's checks, at Mr. Short's request, and volunteered legal services to the campaign, including services in the area of campaign reporting and disclosure regulation. He had, however, no decision-making responsibility, and no authority to make campaign advertising expenditures.

Jim Rice, a long-time state legislator and personal friend of Mr. Short, was not initially included on the advisory committee list, but was invited to serve at an early stage and did attend one or more meetings. He and members of his family also volunteered services to the campaign from time to time. In addition, during the general election campaign, Rice was also retained by the Short Committee as a consultant, for the specific purpose of mobilizing veterans groups in support of Mr. Short. Rice had no decision-making authority within the Short Committee.

Among other individuals who had some identification with both the Short Committee and the Just a Bunch Committee, only Peter Popovich and Bill Cooley need be mentioned here.

Popovich is a St. Paul attorney, former state legislator, and a personal friend of both Wozniak and Mr. Short. He was an occasional campaign volunteer and a co-sponsor of a fund-raising event for the Short Committee held at the Town and Country Club in St. Paul on October 25, 1978. His participation in the affair, however, was essentially limited to allowing his name to be used and co-hosting the function. He had no position or authority in the Short Committee.

Cooley is a well-known political figure in Minneapolis, (then) employed in the office of the Mayor, who has been active in many recent DFL campaigns in Minnesota. He volunteered his services to the Short Committee on a part-time basis, including some assistance in the scheduling of candidate appearances, an area in which Cooley has extensive experience. He had no position or authority in the Short Committee.

Finally, insofar as individuals who had some identification with both the Short Committee and the

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Mr. William C. Oldaker
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September 15, 1979

Employees Committee are concerned, only Oscar Molomot need be mentioned. Molomot is a long-time employee of firms owned by Mr. Short. Molomot volunteered his services to the Short Committee on weekends from time to time. In addition, he performed special tasks for Gates, as requested, principally in obtaining printing or photography work on short notice. On such occasions, Molomot was reimbursed by the Short Committee for out-of-pocket expenses incurred, and the Committee reimbursed Molomot's employer for his time. Molomot held no position or authority in the Short Committee.

The Just A
Bunch Committee

The Just a Bunch Committee was apparently conceived by Wozniak, on October 25, 1978, while in attendance at the Short Committee fund-raiser at the Town and Country Club in St. Paul previously mentioned. The Committee was an outgrowth of his pique with Gates, for the latter's refusal to accept advice from Wozniak and others, and more directly an outgrowth of a conversation Wozniak had with Mr. Short at the fund-raiser, in which Mr. Short rejected Wozniak's request that the Short Committee sponsor a sample ballot for distribution in St. Paul.

Wozniak decided, virtually on the spot, to form a separate committee to attempt to raise funds to print a sample ballot and to carry through with other campaign ideas to which the campaign organization had not been receptive. Following conversations with several people at the fundraiser, Wozniak scheduled a breakfast meeting the following morning, the attendees at which apparently included Wozniak, Brian Short, Rice, Cooley, Frank Ryan (a Minneapolis attorney), Morgan Fleming (a well-known DFL fundraiser, who had co-hosted the Town and Country Club fundraiser with Popovich) and Ole Olson (another well-known DFLer).

The Just a Bunch Committee was organized on the day of the breakfast meeting, October 26, 1978,

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Mr. William C. Oldaker
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September 15, 1979

principally through the efforts of Wozniak, who opened its bank account, became its chairman, recruited Popovich as its co-chairman, and enlisted Brian Short to prepare the necessary organizational documents for filing with the Commission.

During the next several days, the Just a Bunch Committee prepared and printed a sample ballot, ran ads in Twin Cities and Iron Range newspapers, purchased other media time, and financed an airplane campaign swing by several of its members around the state, at the suggestion of a former DFL Governor of Minnesota, Karl Rolvaag, all in support of Mr. Short's candidacy. Wozniak, Cooley and Rice apparently collaborated on the copy for the ads. In addition to volunteering his legal services, Brian Short made a contribution to the Just a Bunch Committee, and successfully solicited a contribution to the Committee from one of his sisters. Other contributors included Fleming, Ryan, Mrs. Wozniak and Wozniak's son, Dan Wozniak.

The Employees Committee

The Employees Committee was apparently conceived by Molomot in mid-October 1978, following conversations with several other employees of Mr. Short's businesses, as a vehicle by which the employees could refute what they believed to be the local media's depiction of Mr. Short as anti-union. The idea likewise stemmed in part from an ad which had appeared in the local press sponsored by employees of businesses owned by Rudy Boschwitz, the Republican candidate for the other U.S. Senate seat from Minnesota.

When Molomot told Mr. Short that his employees intended to chip in to run an ad supporting him, Mr. Short advised Molomot against it. Molomot told him that the employees would do it anyway.

Molomot likewise advised Gates of the employees' plan and Mr. Short's recommendation against it. Gates, mindful of the Boschwitz employees' ad, thought

Mr. William C. Oldaker
Page 8
September 15, 1979

the employees' plan was a good idea, but did not participate in any aspect of its formulation or effectuation.

Molomot obtained the Commission's reporting forms and instructions from Brian Short, organized the Employees Committee, assisted in its fundraising and prepared the copy for its ads. The ads appeared in Twin Cities newspapers in the few days from October 30 through November 2, 1978.

DISCUSSION

The Short Committee had no obligation to report the expenditures of either the Just a Bunch Committee or the Employees Committee as in-kind contributions. The expenditures were "independent expenditures" within the meaning of the statute in question.

As indicated previously, the allegations that the Short Committee violated the Commission's Regulations, 11 C.F.R. § 110.9(a), by accepting contributions in excess of the contribution limits of 2 U.S.C. § 441a, and that the Short Committee violated 2 U.S.C. § 434(b) by not reporting "in-kind" contributions, are bottomed exclusively on the premise that the expenditures of the Just a Bunch Committee and the Employees Committee were not "independent expenditures" by the latter committees, and the conclusion that the expenditures were therefore reportable "contributions" by the Short Committee. Both the premise and the conclusion are without factual or legal support.

First, there is nothing in the Act, as distinguished from the Commission's Regulations, 11 C.F.R. § 109.1(c), to compel the conclusion that expenditures in support of a particular candidate which do not satisfy the definition of "independent expenditures" thereby are, or automatically become, reportable in-kind con-

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Mr. William C. Oldaker
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September 15, 1979

tributions by the candidate's principal campaign committee. Where both the expenditures in question, and the contributions which make them possible, are reported by the committee making the expenditures, the only pertinent area of concern should be the question of affiliation or candidate authorization, an issue not raised in the present inquiry. We will not pursue the point further here, however, because we believe the Commission may consider it inappropriate at this stage of the inquiry.

More importantly, it is the position of the Short Committee that the expenditures of the Just a Bunch Committee and the Employees Committee were "independent expenditures". 2 U.S.C. § 431(p) defines an "independent expenditure" as follows:

"Independent expenditure" means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and which is not made in concert with, or at the request or suggestion of, any candidate or any authorized committee or agent of such candidate....

The expenditures of the Just a Bunch Committee and the Employees Committee plainly satisfy this definition.

With reference to the Just a Bunch Committee, its very existence is traceable to what its principals considered to be a lack of "cooperation" by, and opportunity for "consultation" with, the responsible person (Gates) in the Short Committee. The expenditures of Just a Bunch were not "made in concert with" the Short Committee; they were made without its (or Gates') knowledge, participation, or approval. And, not only were the expenditures not made "at the request or suggestion of" the Short Committee, they were made independently in large part for the very reason that the candidate and/or his campaign manager had expressed opposition to making similar expenditures for the same purposes.

As for the Employees Committee, its activities were narrowly confined to a single purpose advertisement.

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Mr. William C. Oldaker
Page 10
September 15, 1979

The ad was the product of independent action by a long-time employee of the candidate, action taken in spite of the candidate's recommendation against it. The Short Committee was advised of the employees intentions, but the ad itself was financed, prepared and published independently, without any cooperation from, consultation or concert with, or request or suggestion of any kind from, the Short Committee.

Given those circumstances, the only question which remains is whether any of the individuals active in either the Just a Bunch Committee or the Employees Committee can be considered "agents" of the Short Committee by reason of their prior identification with it in one capacity or another. The answer is again clear.

As a matter of law, the individuals whose names have been most frequently identified with the Just a Bunch Committee, Messrs. Wozniak, Popovich, Brian Short, Rice, Cooley, Fleming and Rolvaag, and the individual identified with the Employees Committee, Molomot, were not "agents" of the Short Committee with respect to their activities in the Just a Bunch or Employees Committees because they had neither express nor implied authority from the Short Committee or Mr. Short to do what they did. None of them held a position of authority within the Short Committee; nor is there any evidence that anyone having authority in the Short Committee counseled or advised their actions.

The Commission's Regulations on the subject of independent expenditures, although not raised in your letters, would suggest no different conclusion. Section 109.1(b)(4) of the Regulations, 11 C.F.R. § 109.1(b)(4), provides in part:

"Made with the cooperation or the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of the candidate" means--

(i) Any arrangement, coordination, or direction by the candidate or his or her agent

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prior to the publication, distribution, display, or broadcast of the communication. An expenditure will be presumed to be so made when it is --

(A) Based on information about the candidates plans, projects, or needs provided to the expending person by the candidate, or by the candidate's agents, with a view toward having an expenditure made;

(B) Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent.... [Emphasis added.]

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The Commission staff investigation has produced no evidence that any of the expenditures by the Just a Bunch or Employees Committees were based upon information about the campaign provided by anyone in the Short Committee "with a view toward having an expenditure made", within the meaning of subparagraph (A) of the regulation. And, with reference to subparagraph (B), for example, to the extent that Fleming's prior fundraising activity for the Short Committee, Rice's receipt of compensation for consulting services from the Short Committee, or the Short Committee's occasional reimbursement of Molomot's out-of-pocket expenses may raise "presumptions" under subsection (i) of the regulation that the expenditures of the unauthorized committees were not "independent", such presumptions have been fully rebutted by the evidence produced during the inquiry.

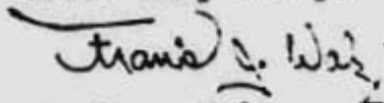
In summary, the expenditures made by the Just a Bunch Committee and the Employees Committee were made independently from, and not at the instance or suggestion, express or implied, of the Short Committee and/or Mr. Short. The individuals involved, whether friends, relatives or employees of Mr. Short, or simply DFLers,

Mr. William C. Oldaker
Page 12
September 15, 1979

acted entirely on their own, individually and collectively, as they had every legal and constitutional right to do. The contributions and expenditures of the political committees they formed were reported to the Commission, and, as the staff knows, the origin and purpose of, and the participants in, the committees, as well as their various relationships to the Short Committee and Mr. Short, were fully explored in the local media prior to the general election.

We respectfully submit that the complaint letters should be dismissed.

Yours very truly,


Frank J. Walz

FJW:emw

33040411377

September 15, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1025 K Street N.W.
Washington, D. C. 20463

Re: HUR 912

Dear Mr. Oldaker:

Enclosed please find the submission of the Short Committee relating to the issues in the above matter.

There is one additional point which should be mentioned, which I previously discussed with Gary Johnson of your staff. If you will recall, during the investigation, it became apparent that late in November 1978 the Short Committee paid an invoice of J.F.P. & Associates, Inc., a Duluth advertising agency, which was directed to the Just a Bunch Committee. At his deposition, Fred Gates testified that the payment of the invoice was wholly inadvertent, and that it was paid in error in connection with the payment of several overdue invoices of J.F.P. to the Short Committee. [Tr., Fred Gates Deposition, pp. 32-37; Gov't. Exs. 3, 4.]

Following his deposition, I asked Fred Gates to direct a letter to J.F.P. to request an acknowledgment of the error and a clarification. He did so, on July 16, and a copy of the letter response of J.F.P. & Associates, Inc. dated July 20, 1979 is enclosed. Fred is currently out of town, and thus I have been unable to obtain a copy of his letter to J.F.P. for you, or to find

Exhibit 2

Mr. William C. Oldaker
Page 2
September 13, 1979

out what has transpired since with regard to the invoice. If you would like me to follow up in that regard, please advise.

Yours very truly,

Frank J. Walz

FJW:am/

enclosures

83040411373

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

July 20, 1979

Fred L. Gates
for the Short for Senate Committee of Volunteers
c/o 1014 Third Avenue South
Minneapolis, Minnesota 55404

Mr. Gates:

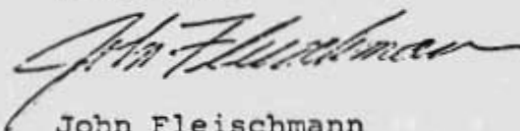
Upon receipt of your July 16th letter concerning invoice number 10473, we have checked back into our records and verify the fact that this invoice was addressed to "Just A Bunch Of DFL Folks Who Want Common Sense Government Committee."

In further checking, we verify your payment of \$6,654.39 dated November 27, 1978 which did include payment of invoice number 10473 for \$3,004.01.

We agree that the amount paid was incorrect and we will resolve the matter as soon as possible.

Thank you.

Sincerely,



John Fleischmann
J.F.P. & Associates
425 Lake Avenue South
Duluth, Minnesota 55802

JF/jk

RECEIVED
JUL 31 1979
LEAMINGTON HOTEL

33040411330



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 28, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian P. Short
828 Midland Bank Building
401 2nd Avenue, South
Minneapolis, Minnesota 55401

Re: MUR 812

Dear Mr. Short:

In furtherance of its investigation into the above-referenced matter, the Commission requests that you provide certain information in addition to that provided by your testimony of June 19, 1979.

Please submit your response to the enclosed questions under oath, within five days of your receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3).

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

cc: Frank Walz

Exhibit 3

QUESTIONS

Brian P. Short

You have testified that you prepared all of the financial disclosure reports filed with the Commission by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("JAB"). ^{1/} In this regard, please state, in detail, your responsibilities surrounding the preparation of financial reports for JAB. Your response should address the following:

1. A description of your bookkeeping procedures (i.e. whether you kept a continuous tally of JAB's outstanding bills as well as the committee's total assets);
2. A description of your involvement in JAB's bank transactions (i.e. whether you made deposits and authorized or made withdrawals);
3. Whether JAB contributions or copies of contributor information were forwarded to you for use in preparation of JAB reports;
4. From where financial information came, including JAB expenditures as well as contributor information;
5. A list of each individual involved in supplying JAB's financial transaction information to you;
6. Whether you ever kept any JAB documents or any written instruments concerning JAB at the principal campaign committee headquarters;
7. Whether you conducted any of your JAB activities whatever at the principal campaign committee headquarters;
8. A list of each location where you conducted any JAB business whatever;
9. A detailed explanation as to your knowledge of the JAB invoice in the amount of \$6,554.39 (Attachment I);

^{1/} Short deposition, June 19, 1979, Tr. p. 59.

10. A detailed explanation as to your knowledge of the Short for Senate Committee of Volunteers check in the amount of \$6,554.39 made payable to JFP & Associates (Attachment II);

11. The date you first became aware that JAB had entered into a business commitment with JFP & Associates;

12. A list of all such agreements entered between the two parties mentioned above;

13. The date on which you first saw attachment I; attachment II;

14. Whether you were aware at any time that JAB had an outstanding bill payable to JFP & Associates;

15. Whether you apprised Donald Wozniak or anyone else of the financial status of JAB on a continuous basis; or ever;

16. To whom you gave financial information; and

17. Whether Wozniak's secretary or anyone else ever sent JAB information to you at the principal campaign committee;

18. It appears that the total bill in the amount of \$6,554.39 results from the addition of three different charges in the amounts of \$3,004.01, \$2,691.52, and \$958.86. Please state what goods or services the invoice provided per charge;

19. Please explain, to the best of your knowledge, why the invoice was at the principal campaign committee;

20. Please state whether your signature was one of the signatures on the check labeled as Attachment II; and

21. Please state why JAB's expenditure/debt to JFP & Associates was not reported to the Commission pursuant to 2 U.S.C. §434(b).

33041133

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn. 55802 (218) 723-5500

Date November 6, 1978

FEC ATTACHMENT I
Inv. No. 10473

Your P. O. No. _____

[Just A Bunch Of DFL Folks Who Want
Common Sense Government Committee
401 Midwest Federal Building
St. Paul, MN 55101]

1934
pd

No.

239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01
2691.52
958.86

\$ 6654.39

8304041133

8304041133

1934

11/27 1978

17-115 010

PAY TO THE ORDER OF JFF & Associates, Inc. \$ 6,654.39

Six Thousand Six Hundred and Fifty-Four Dollars and 39/100 DOLLARS

NATIONAL CITY BANK
OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA 55402

545

10014931 00091001157 10106136

0000665439

01 ACCOUNT NRK 104-6136		LIST OF CHECKS		DATE 12/12/78		PAGE 1	
BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT
0094	4,950.00 0116		65.96 0116	7,109.77 0160	35.00 0162		
0223	1,026.97 0214		7,154.92 0225	114.36 0225	112.17 0271		
0305	535.26 0352		6,654.39				
TOTAL NUMBER OF ITEMS 12		TOTAL DOLLAR AMOUNT		28,674.77			

1973

PAY AIR MAIL, FEBRUARY
FEB - MINNEAPOLIS
0910-0003-0

12

DEC

137

1973

PAY AIR MAIL, FEBRUARY
FEB - MINNEAPOLIS
0910-0003-0

12

DEC

1978

1973
FEB - MINNEAPOLIS
0910-0003-0
12
DEC
137

1973

PAY AIR MAIL, FEBRUARY
FEB - MINNEAPOLIS
0910-0003-0

12

DEC

1978

1973
FEB - MINNEAPOLIS
0910-0003-0
12
DEC
137
1973
FEB - MINNEAPOLIS
0910-0003-0
12
DEC
137
1978

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402

(612) 341-3800

TELEX 29-0584

TELECOPIER 612 341-3800 (256)

PASEO DE LA CASTELLANA, 8
MADRID 1, SPAIN
276-5524
TELEX 23802 PALW E**

DAVID BURLINGAME*
MARTIN M. BERLINER*
GREGORY A. KEARNS*
SUITE 1100 SECURITY LIFE BUILDING
1616 GLENHORN PLACE
DENVER, COLORADO 80202
(303) 873-7737

SUITE 800
1616 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 788-8700

PATRICK J. O'CONNOR
WILLIAM T. HANNAN*
EDWARD W. BROOKS*
JOHN J. FLYNN
H. ROBERT HALPERN*
JOSEPH E. DILLON
THOMAS H. GUINN*
HOWARD G. FELDMAN*
DAVID R. MELINCOFF*
DELANCEY W. DAVIS*
RICHARD G. MORGAN
PHILIP R. HOCHBERG*
THOMAS V. VAREKIS*
DOUGLAS M. CARNIVAL*
TERENCE P. BOYLE*
HOPE S. FOSTER*
BRIAN P. SHELAN*
THOMAS R. JOLLY*
BARRY J. GUTLER*
MICHAEL J. CONLON*
DONALD S. ARBOUR*
PETER C. RIBBEL*
CAROL N. PARR*
JOSEPH E. HATTISON*
CHARLES W. GARRISON*
GORDON A. GAYER*
ROBERT J. STEELE*
CHRISTINA W. FLEPS*
MICHAEL E. VEVE*
MARTHA PRIDDY MATTERSON*
JAMES H. HOLTS*

OF COUNSEL
JOSEPH F. CASTIELLO*
FRED D. THOMPSON*
JOHN H. HOLLOMAN III*

*** MEMBER OF MINNESOTA BAR

October 8, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

Enclosed please find a letter dated October 5, 1979 from Brian Short to you, together with Brian Short's affidavit of the same date, being provided in response to your letter request dated September 28, 1979, and the list of questions which accompanied that request. I asked Brian to deliver the enclosures to me for my review prior to their submission.

I have a few additional comments to offer concerning the records of the Just a Bunch Committee, and some additional bits of information concerning the J.F.P. Associates, Inc. invoices in question, which were provided to me by J.F.P. at my request.

First, with respect to the several questions you posed concerning the records of the Just a Bunch Committee, and Brian Short's performance of services to the Committee in the preparation of its reports to the Commission, I think it is important to bear in mind that the Just a Bunch Committee was a spontaneous creation of essentially two weeks' duration at the tail end of a

Exhibit 4

Mr. William C. Oldaker
Page 2
October 8, 1979

general election campaign, not the carefully-planned and structured campaign organization which some of your questions would seem to contemplate.

Next, the records of the Just a Bunch Committee which were in Brian Short's possession, and which he has said were at all times maintained in his law office, were made available to you and your staff in June, in their entirety. Those records are presently in my custody, intact, and continue to be available for inspection. It is fair to say, however, that in reviewing those records, I find no J.F.P. invoice to Just a Bunch, or any other record of any transaction between J.F.P. and Just a Bunch, among them. As you will see from his affidavit, Brian Short first saw the J.F.P. invoice to Just a Bunch in June of this year. More specifically, he first saw it when it was shown to him at my request when a question was first raised concerning the invoice at the time of Fred Gates' deposition.

Next, your question number 9 refers to a Just a Bunch invoice "in the amount of \$6,554.39." The invoice itself is in the amount of \$3,004.01, and contains separate handwritten notations of two additional amounts, namely, \$2,691.52 and \$958.86. The latter two amounts, as I believe Fred Gates testified, and as it turns out, represent the amounts of two other J.F.P. invoices, not to Just a Bunch, but to the Short Committee.

Following my receipt of a copy of your questions to Brian Short, I called J.F.P. and requested copies of the invoices themselves, together with copies of the media schedules which reflect what the invoices were for. Those copies, as received from J.F.P., are enclosed for your information.

As you will see, the invoice to the Short Committee for \$2,691.52 is dated October 1978, and represents the Short Committee's pro rata share of the cost of a series of newspaper ads run jointly in a number of northern Minnesota newspapers with two other committees supporting Democratic candidates. The invoice to the Short Committee for \$958.86, also dated October 1978, likewise represents the Short Committee's pro rata share of joint newspaper ads in northern Minne-

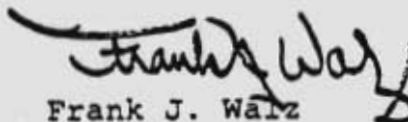
Mr. William C. Oldaker
Page 3
October 8, 1979

sota newspapers on behalf of several Democratic candidates. The third invoice, the invoice dated November 6, 1978 to Just a Bunch, represents charges for several radio and TV spots purchased on Duluth and Hibbing, Minnesota radio and television stations.

While I do not pretend to be much of a sleuth, I have a growing hunch that this entire matter may have developed by someone at J.F.P. inadvertently forwarding all three invoices to the Short Committee. It is clear to me, in any event, that the Short Committee paid all three invoices with one check, without noticing that one of the invoices was directed to Just a Bunch, and that the Short Committee's payment of the latter invoice was wholly unintentional and inadvertent.

If I can be of any further assistance in this matter, please advise.

Yours very truly,


Frank J. Walz

FJW:emw

enclosures

33040411333

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

AREA CODE 612
TELEPHONE 332-0337

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

October 5, 1979

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

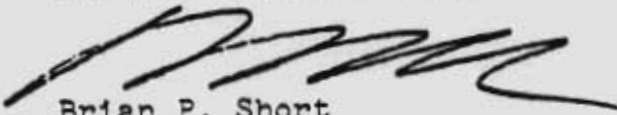
Enclosed, in affidavit form, are my answers to the questions which accompanied your letter of September 28, 1979.

The second paragraph asks that I submit other "factual or legal material" which I "deem relevant to the Commission's investigation of this matter."

I believe I have fully and adequately responded to each and every inquiry which the Commission has directed to me. I am not aware of any other material you might find helpful. If, however, there is anything else which you, or any member of your staff, believe pertinent and which I can supply, please let me know.

Sincerely,

FOSTER, JENSEN & SHORT


Brian P. Short

BPS/lk
Enclosure

STATE OF MINNESOTA

SS.

COUNTY OF HENNEPIN

and says:

this letter until late that evening or the next morning.

accompanied that letter:

Summary

The Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee did not to the best of my knowledge, have any formal bookkeeping system. All bills, receipts, invoices, deposit slips and other financial information were kept by the members of the committee. From the scraps of information and bank statements I prepared the committee's reports.

1. I did not employ any formal bookkeeping procedures. I did not keep a tally of JAB's outstanding debts. Others may have kept a tally of its assets.
2. Some of the deposit slips are in my handwriting so I must have made some deposits. I do not believe I ever made or authorized any withdrawals.
3. Some contributor information was forwarded to me for use in preparation of JAB's financial reports.
4. I do not understand question. Financial information came from members of the committee. Some information, such as addresses or occupation of contributors may have come from other sources (e.g. telephone books).

5. Francis J. Ryan, Michael Ryan, D. D. Wozniak, William O. Cooley.
6. No
7. No. I prepared all the Committee Reports at my law office.
8. My office. I believe I asked my sister to contribute at a restaurant.
9. Prior to my deposition in this matter, I didn't know anything about it.
10. Prior to my deposition in this matter I didn't know anything about it.
11. I have no present recollection that JAB ever entered into a business relationship with JFP & Associates. I do remember speaking to Mr. Jeno Paulucci in early November, before the election.
12. N.A.
13. June, 1979.
14. Not before June, 1979.
15. After the election, I believe I sent Mr. Wozniak copies of the financial reports.
16. Other than any involvement I may have had in sending letters and telegrams to the FEC, I don't believe I gave financial information to anyone.
...I am sure I reported to a number of people that I had succeeded in raising some money from my brothers and sisters.
17. No
18. I do not know.
19. I do not have any idea.
20. It is not.

21. Apparently because the invoice was not in my file.
Further affiant saith not.


Brian P. Short

Subscribed and sworn to before me
this ____ day of October, 1979.

Notary Public

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date October 1978

Inv. No. **10415**

Your P. O. No. _____

[Short for Senate Committee of Vol.]
1011 Marquette Avenue
Minneapolis, MN 55403
Fred L. Gates, Campaign Manager
[R.J. Foster, Treasurer]

Job No.
6753

Don't Be Misled - (Newspaper Ads)

\$2,691.52

8304041139

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE

CLIENT: PERPICH-OLSON COMMITTEE
ANDERSON VOLUNTEER COMMITTEE
SHORT FOR SENATE COMMITTEE OF VOLUNTEERS

Job No. 5753

Date October 19, 1978

PAGE AD: Don't Be Misled

MARKET	MEDIUM	DATES	TOTAL COST
Duluth Sunday News-Tribune		Sun. November 5	\$ 1,769.88
Hibbing Daily Tribune		Fri. November 3	457.52
International Falls Journal		Fri. November 3	361.20
Virginia Mesabi Daily News		Fri. November 3	553.84
Aurora East Range Shopper		Wed. November 1	101.47
Aurora Range Facts/Biwabik Times		Fri/Thu November 2/3	255.00
Bovey Scenic Range News		Thu. November 2	89.60
Chisholm Free Press		Thu. November 2	110.30
Chisholm Tribune Press		Tue. October 31	110.30
Duluth Budgeteer		Wed. November 1	805.69
Duluth Labor World		Thu. November 2	225.01
Ely Echo		Wed. November 1	295.84
Ely Miner		Wed. November 1	210.00
Floodwood Forum		Thu. November 2	84.00
Grand Rapids Review		Thu. November 2	255.00
Hashwauk Eastern Itasca		Thu. November 2	235.20
Proctor Journal		Thu. November 2	94.50
Tower News		Thu. November 2	105.00
Two Harbors Lake Co. News Chronicle		Wed. November 1	291.77
Eveleth Range Scene		Wed. November 1	181.18
Gilbert Herald		Wed. November 1	181.18
Cloquet Pine Knot		Thu. November 2	500.06
Aitkin Independent Age		Wed. November 1	167.70
Crow Wing County Review/Walker			
Pilot Independent		Thu. November 2	326.30
Moose Lake Star Gazette		Thu. November 2	307.02

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE

Job No. 5753

Date October 19, 1978

CLIENT:

MARKET	MEDIUM	DATES	TOTAL COST
83040111			
596			
TOTAL COST:	\$ 8,074.56		
1/3 =	\$ 2,691.52		

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

Job No. 5753

Date October 27, 1978

CLIENT: Anderson-Oberstar-Perpich-Short

FULL PAGE AD: Special Interest

[illegible]

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8936

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE.

Job No. _____

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
GOVERNMENT COMMITTEE

pg. 2

MARKET	MEDIUM	DATES	TOTAL COST
<u>WAKX-AM/FM - Duluth, Minn.</u>			
13 :60 spots			\$ 124.60
<u>WEBC-AM - Duluth, Minn.</u>			
28 :60 spots			\$ 376.48
<u>WIFG-AM - Hibbing, Minn.</u>			
12 :60 spots			\$ 63.53
TOTAL: \$2,954.01			
DUBS: 50.00			
GRAND TOTAL: \$3,004.01			

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date November 6, 1978

Inv. No. **10473**

Your P. O. No. _____

Just A Bunch Of DFL Folks Who Want
Common Sense Government Committee
401 Midwest Federal Building
St. Paul, MN 55101

Job No.

1239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01

830404113

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE

Job No. 1239

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
GOVERNMENT COMMITTEE

MARKET	MEDIUM	DATES	TOTAL COST
<u>KDAL-TV - Duluth, Mn.</u>			
5 :30 spots & 4 :60 spots			\$1,294.00
<u>KDIO-TV - Duluth, Mn.</u>			
4 :30 spots			\$ 310.00
<u>KBJR-TV - Duluth, Mn.</u>			
5 :30 spots			\$ 440.00
<u>WDSM-TV - Duluth, Mn.</u>			
18 :60 spots			\$ 159.00
<u>KDAL-TV - Duluth, Mn.</u>			
11 :60 spots			\$ 186.50

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date October 1978

Inv. No. **10433**

Your P. O. No. _____

Short For Senate Committee Of Vol.
1011 Marquette Avenue
Minneapolis, MN 55403
Fred Gates, Campaign Manager
R.J. Foster, Treasurer

Job No.

6753

Special Interest - (Newspaper Ad)

\$958.86

8304041140



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 31, 1979

Mr. Frank Walz
O'Connor & Hannan
Thirty-Eighth Floor, IDS Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Re: MUR 812

Dear Mr. Walz:

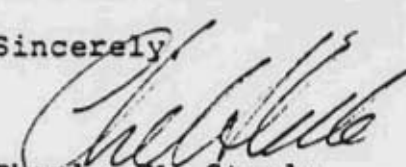
This letter is to advise you that the Commission has determined there is no reasonable cause to believe that your client, the Short for Senate Committee of Volunteers (SSCV) has violated 2 U.S.C. § 441b and has determined that it will take no action with regard to your client's violations of § 434(b) and 11 C.F.R. § 110.9(a).

The Commission has determined that the expenditures made on behalf of Mr. Short by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (JAB) and the Employees of Bob Short Companies Committee (Employees Committee) are not independent within the meaning of 2 U.S.C. § 431p. Accordingly, the expenditures are considered in-kind contributions (see 11 C.F.R. § 109.1(c)) reportable by SSCV pursuant to 2 U.S.C. § 434. Thus, the Commission's determination to take no further action with regard to SSCV's violation is contingent upon the filing of amended reports by SSCV.

The Commission requests that your client file amended reports reflecting receipt of \$30,122 from JAB and \$4,227 from the Employees Committee within thirty days or advise the Commission of your intentions in this matter. Upon receipt of the amended reports, I will recommend that the Commission close its file in this matter as it pertains to SSCV.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4055.

Sincerely,


Charles N. Steele
General Counsel

RECEIVED
JAN 4 1980

Exhibit 5

33040411402

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FIRST CLASS

FROM—O'CONNOR & HANNAN
THIRTY-EIGHTH FLOOR IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

FOR Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

FIRST CLASS

April 21, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812 - 2 Briefs

Please have the two attached Memos distributed to the Commission on an informational basis. Please return the originals to this office. Thank you.

8304041140



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas H. Jensen
828 Midland Bank Building
401 Second Avenue, South
Minneapolis, Minnesota 55401

Re: MUR 812

Dear Mr. Jensen:

Based on a complaint filed with the Commission on November 2, 1978, the Commission determined on December 20, 1978, that there was reason to believe that the Employees of Bob Short Companies Committee may have violated sections 434(b), 433, 441d and 441a of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. 110.9(a) of the Commission's Regulations and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations of 2 U.S.C. § 434(b) and 441a have occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.


83040411403

Mr. Thomas H. Jensen
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Brief

83040411406

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Thomas H. Jensen

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
444588

4. I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
L. Klem
DATE OF DELIVERY 4-25-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

APR 25 1980

48UR 812



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank J. Walz
38th Floor, IDS Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Re: MUR 812

Dear Mr. Walz:

Based on a complaint filed with the Commission on November 2, 1978, the Commission determined on December 20, 1979, that there was reason to believe that the Short for Senate Committee of Volunteers may have violated sections 441b and 434(b) of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. 110.9(a) of the Commission's Regulations and instituted an investigation of this matter.

After completion of its investigation, the Commission determined that there is no reasonable cause to believe SSCV violated 2 U.S.C. § 441b and determined that it would take no further action against SSCV in connection with its violations of § 434(b) and 11 C.F.R. 110.9(a). The Commission finding with regard to the § 434(b) violation was made contingent upon SSCV's filing of amended reports reflecting receipt of in-kind contributions from JAB and Employees Committee.

After considering all the evidence available to the Commission and since SSCV has not filed amended reports, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

83040411407

Mr. Frank J. Walz
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

33040411408

Callahan MUR 812

PS Form 3811, Apr 1977

1. The following service is requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
☐ Show to whom and date delivered
☐ RESTRICTED DELIVERY
☐ Show to whom, date, and address of delivery. \$_____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Frank Walz
IDS Tower
Minneapolis, MN 55402

3. ARTICLE DESCRIPTION
REGISTERED NO. 152947 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE *Eric Chadwick* ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY JUL 18 1980
POSTMARK 0861

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

STPS 1977-8-240-10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 812

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on April 21, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

83040411405

BEFORE THE FEDERAL ELECTION COMMISSION
April 7, 1980

In the Matter of)
Short for Senate Committee)
of Volunteers)

MUR 812

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF CASE

On December 20, 1978, the Commission, based upon a notarized complaint filed by Paul Overgaard, found reason to believe that the Short for Senate Committee of Volunteers ("SSCV") may have violated the following provisions of the Federal Election Campaign Act of 1971, as amended: (a) 2 U.S.C. § 441b by entering into a rental agreement for office space outside the ordinary course of business and by using corporate WATS lines for campaign purposes; (b) 2 U.S.C. § 434 (b) for not properly reporting receipt of certain in-kind contributions from the Employees of Bob Short Companies Committee and the Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee; and (c) 11 C.F.R. 110.9(a) by accepting contributions in excess of the limitations in 2 U.S.C. § 441a.

After an investigation having been conducted, the Commission on December 18, 1979, determined that there was no reasonable cause to believe that SSCV violated 2 U.S.C. § 441b. On that same date, the Commission voted to take no further action against SSCV for its violations of § 434 and § 110.9(a); its finding with regard to the § 434 violation was contingent upon SSCV's filing of amended reports reflecting receipt of in-kind contributions from JAB and Employees Committee. As of this writing, SSCV has not filed amended reports.

The Office of General Counsel's findings in connection with its investigation are discussed below.

II. LEGAL ANALYSIS

Since a Commission determination in connection with the Short for Senate Committee of Volunteers is contingent upon whether or not the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (JAB) and the Employees of Bob Short Companies Committee (Employees Committee) are independent within the meaning of the Act and Regulations, it is initially necessary to analyze the independent expenditure status of these two entities. Any consideration of the legal culpability of SSCV hinges on this analysis.

Employees Committee

The Employees Committee registered with the Commission on November 6, 1978, as an unauthorized single candidate committee acting on behalf of the Senate candidacy of Robert Short.

On December 21, 1978, Oscar Molomot, Chairman of the committee, was notified of the initiation of an investigation into the activities of the committee based upon Overgaard's complaint.

The evidence indicates that the Employees Committee was formed by employees of candidate Short to portray Mr. Short as a trustworthy, reliable, and reasonable employer; Molomot conceived of the idea of placing an ad in the local press. The plan was to have employees of Short companies contribute funds, voluntarily, to pay for advertisements in support of the candidate.

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The disclaimer contained in the advertisement at issue indicates that it was not authorized by candidate Short. The complainant alleges that because Oscar Molomot was reimbursed for expenses by the principal campaign committee, SSCV, the expenditure for the advertisement could not have been independent.

11 C.F.R. 109.1, as it applies in the instant matter, defines independent expenditures to mean:

"... an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of a candidate or any agent or authorized committee of such candidate." 11 C.F.R. 109.1(a)

"Made with the cooperation...." 11 CFR 109.1(b)(4) is defined to mean:

"Any arrangement, coordination or direction by the candidate or his or her agent prior to the publication, distribution, display, or broadcast of the communication. An expenditure will be presumed to be so made when it is ...

"Made by ... any person ... who is, or has been receiving any form of compensation or reimbursement from the ... candidate's committee...." 11 C.F.R. 109.9(b)(4)(i)(3).

Thus, where a candidate's committee compensates any person who makes an expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate prior to dissemination of the communication, it is presumed that the expenditure is made with the cooperation or with the prior consent of, or in consultation with, or at the suggestion of a candidate or any authorized committee of the candidate and is not independent.

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The evidence gathered during the course of our investigation indicates that: 1) Oscar Molomot received \$382 in reimbursements for out-of-pocket expenses from the principal campaign committee, and 2) SSVC reimbursed Molomot's employer for that portion of Molomot's salary for his time spent on campaign related business during working hours; Molomot spent approximately 60% of his time on campaign business during working hours in April 1978, and 5% in May and June. All additional work time which Molomot spent campaigning was billed by the hour to the principal campaign committee by Molomot's employer. Because Molomot personally received reimbursement for out-of-pocket expenses and his employer was compensated by the principal campaign committee, these facts sustain the presumption that the expenditures for the Employees Committee advertisements were not independent.

JAB

JAB registered as a political committee on November 2, 1978. The statement of organization filed by JAB indicated that the committee was formed to support both Robert Short and Wendell Anderson. However, all of the committee's expenditures were made on behalf of Short; thus, the committee acted as an unauthorized single candidate committee.

Investigation revealed that Donald Wozniak and friends of Short, organized the JAB committee because they were not satisfied with the way the principal campaign committee was being run and the manner in which the campaign itself was

being conducted. Don Wozniak and Short's campaign manager, Fred Gates, were in substantial, almost violent, disagreement about the principal committee's campaign strategy especially as the strategy involved St. Paul, Minnesota, Wozniak's claimed area of expertise. Wozniak and Gates did not communicate with one another after the formation of JAB.

Wozniak maintains he formed JAB on October 25, 1978, at a Bob Short fundraiser sponsored by SSVC. According to Wozniak, potential members of the JAB committee were solicited for their participation at the fundraiser; the next morning, Wozniak held a meeting during which it was decided what the committee would try to accomplish and how it would raise money.

The complainant submitted advertisements which were placed by JAB supporting candidate Short and the "entire DFL ticket." The disclaimers read in part, "no candidates have authorized this ad." Complainant contends that since Donald Wozniak was an active participant in Short's principal committee and contributed funds to it, the expenditures made by JAB could not be independent of the Short campaign.

As defined by 2 U.S.C. § 431(17) (formerly 431(p)), in order for an expenditure to be independent, it must be made "without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and ... not made in concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate."

Investigation revealed that all but one of JAB's officers were affiliated with SSCV prior to the formation of JAB. Each individual's specific involvement with the SSCV is listed below:

Donald Wozniak - Chairman, JAB, worked in the St. Paul Office of SSCV and was a member of an advisory committee to SSCV.

Peter Popovich - Vice Chairman, JAB, hosted the October 25, 1978, fundraiser sponsored by SSCV.

James Rice - Vice Chairman, JAB, was a paid consultant to SSCV and was a member of the advisory committee.

Karl Rolvaag - Vice Chairman, JAB, was a member of the advisory committee.

Wozniak, Popovich, Rice and Rolvaag also were involved in a one-day tour of the state with candidate Short.

As set forth in § 109.1(b)(4)(i)(B), an expenditure is not independent if it is

(B) Made by or through any person who is, or has been authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent.

The \$1,200 compensation to Rice must be considered when analyzing the independent expenditure status of JAB.

In addition to the above-named individuals, Brian Short (the candidate's son), although not an officer of JAB, acted as its treasurer; at the same time, Brian Short held the position of campaign director of the principal committee, headed the advisory committee to the principal committee and also acted as the principal campaign committee's counsel. Brian Short was also an authorized agent of SSCV whose signature was one of three authorized signatures for the expenditure of SSCV money. 1/

1/ SSCV's policy was that 2 out of 3 authorized signatures were required on each committee check. The three individuals with authorized signatures were Brian Short, Fred Gates and Tom Jensen.

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Investigation indicates that the meetings of the advisory committee were sporadic and not formal, and that input from its members, notably Wozniak, to the principal campaign committee was ignored; Wozniak apparently urged the principal campaign committee to print a sample ballot to be used by the voters at the polls. Wozniak claimed that this was a necessity for St. Paul voters. This suggestion was ignored. Because of this, Wozniak formed the JAB Committee.

The question of JAB's independence need not turn on the role of the advisory committee. Brian Short's dual involvement with both JAB and SSCV must also be considered. In addition to his activities for the principal campaign committee, as outlined above, Short served as both bookkeeper and de facto treasurer for JAB and prepared regular reports for submission to the Commission.

Evidence indicates that Wozniak approached Brian Short with his idea to form a separate committee and that Brian concurred with his plan. Wozniak's acceptance of the chairmanship of JAB was contingent upon Brian acting as its lawyer and bookkeeper; Brian accepted and performed both duties.

Apparently, even though Walter Riordin held the title of treasurer of JAB, he served the position in title only since Brian actually carried out the treasurer's duties.

As set forth in 2 U.S.C. § 431(17) (formerly 431(p)),

"independent expenditure" means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate or any

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authorized committee or agent of such candidate and which is not made in concert with, or at the request or suggestion of, any candidate or any authorized committee or agent of such candidate. (Emphasis added.)

Since Brian was an authorized agent of SSCV, he cooperated with JAB by his mere involvement with the latter committee, acting as its counsel, bookkeeper, and its de facto treasurer. He also solicited and contributed funds to JAB.

Finally, a review of the principal committee's records made available to us during our investigation, revealed that SSCV paid a JAB bill in the amount of \$3,000 from the former's treasury. Neither Fred Gates who authorized the payment nor Donald Wozniak or Brian Short could explain why the payment was made other than it was inadvertent. We have been advised by SSCV that JFP and Associates will repay it \$3,001 in light of the fact that JFP's billing and SSCV's subsequent payment were in error.

The following factors should thus be taken into consideration, collectively, when analyzing the independent expenditure status of JAB:

(a) James Rice, an officer of JAB, was a paid consultant for SSCV;

(b) all of JAB's officers except for Walter Riordin were members of SSCV's advisory committee;

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(c) an invoice for services rendered to JAB was paid by SSCV; and

(d) Brian Short acted as counsel, bookkeeper and de facto treasurer for JAB while continuing to hold an official position with SSCV.

The Office of General Counsel views the above-listed factors as indicative of the non-independent expenditure status of JAB in that the criteria for "independence" set forth in 2 U.S.C. § 431(17) (formerly § 431(p)) (11 C.F.R. 109.1) have not been met.

Short for Senate Committee of Volunteers (SSCV)

The evidence gathered during our investigation, as outlined here, indicates that neither JAB nor the Employees Committee meet the criteria set forth in 2 U.S.C.. § 431(17) for independent expenditure status.

As set forth in 11 C.F.R. 109.1(c), "an expenditure not qualifying under this section as an independent expenditure shall be a contribution in-kind to the candidate and an expenditure by the candidate unless otherwise exempted."

Thus, since JAB and Employees Committee are not independent, then expenditures on behalf of Short are reportable by SSCV.

As previously stated, the Commission's "no further action" determination of December 18, 1979, with regard to SSCV's violation of §434(b) was contingent upon the filing of amended reports.

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Since SSCV has not filed amended reports, the Office of General Counsel recommends that the Commission find probable cause to believe that SSCV has violated §434.

III. GENERAL COUNSEL'S RECOMMENDATIONS

Find probable cause to believe that SSCV has violated 2 U.S.C. § 434.

21 April 1980
Date



Charles N. Steele
General Counsel

83040411419



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank J. Walz
38th Floor, IDS Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Re: MUR 812

Dear Mr. Walz:

Based on a complaint filed with the Commission on November 2, 1978, the Commission determined on December 20, 1979, that there was reason to believe that the Short for Senate Committee of Volunteers may have violated sections 441b and 434(b) of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. 110.9(a) of the Commission's Regulations and instituted an investigation of this matter.

After completion of its investigation, the Commission determined that there is no reasonable cause to believe SSCV violated 2 U.S.C. § 441b and determined that it would take no further action against SSCV in connectin with its violations of § 434(b) and 11 C.F.R. 110.9(a). The Commission finding with regard to the § 434(b) violtion was made contingent upon SSCV's filing of amended reports reflecting receipt of in-kind contributions from JAB and Employees Committee.

After considering all the evidence available to the Commission and since SSCV has not filed amended reports, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

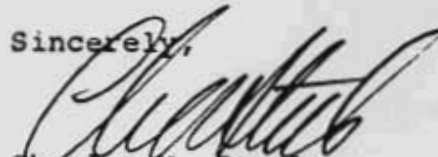
3 3040411420

Mr. Frank J. Walz
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

33040411421



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 APR 21 P 1: 51

April 21, 1980

MEMORANDUM TO: THE COMMISSION

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 812

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on April 21, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

83040411422

BEFORE THE FEDERAL ELECTION COMMISSION
April 4, 1980

In the Matter of)
Employees of Bob Short)
Companies Committee)

MUR 812

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 20, 1979, the Commission, based upon a notarized complaint filed by Paul Overgaard, found reason to believe that the Employees of Bob Short Companies Committee ("Employees Committee") may have violated 2 U.S.C. §§ 433, 434(b), 441a, 11 C.F.R. 110.9(a) and 441d.

An investigation was conducted and on November 14, 1979, the Commission determined it would take no further action with regard to the Committee's violation of 2 U.S.C. §433 and found no reasonable cause to believe violations of 11 CFR 110.9 (a) and §441d had been committed.

The Office of General Counsel's findings with respect to the Committee's violations of §434(b) and §441a are discussed below.

II. Legal Analysis

Independent Expenditure Status:

Since the Commission findings in connection with §434(b) and §441a, are contingent upon whether or not Employees Committee

83040411425

is independent within the meaning of the Act and Regulations; the independent expenditure status of the group is addressed separately below.

The evidence indicates that the Employees Committee was formed by employees of candidate Short to portray Mr. Short as a trustworthy, reliable, and reasonable employer; Molomot conceived of the idea of placing an ad in the local press. The plan was to have employees of Short companies contribute funds, voluntarily, to pay for advertisements in support of the candidate.

The disclaimer contained in the advertisements placed by the Employees Committee indicates that it was not authorized by candidate Short. The complainant alleges that because Oscar Molomot was reimbursed for expenses by the principal campaign committee, SSCV, the expenditure for the advertisement could not have been independent.

11 C.F.R. 109.1, as it applies in the instant matter, defines independent expenditures to mean:

"... an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of a candidate or any agent or authorized committee of such candidate." 11 C.F.R. 109.1(a)

"Made with the cooperation..." (11 C.F.R. 109.1(b)(4)) is defined to mean:

"Any arrangement, coordination or direction by the candidate or his or her agent prior to the publication, distribution, display, or broadcast of the communication. An expenditure will be presumed to be made when it is ...

"Made by ... any person ... who is, or has been receiving any form of compensation or reimbursement from the ... candidate's committee...." 11 C.R.F. 109.1(b)(i)(B).

Thus, where a candidate's committee compensates any person who makes an expenditure for a communication expressly advocating the election or defeat of a clearly identified candidate prior to dissemination of the communication, it is presumed that the expenditure is made with the cooperation or with the prior consent of, or in consultation with, or at the suggestion of a candidate or any authorized committee of the candidate and is not independent.

The evidence gathered during the course of our investigation indicates that: 1) Oscar Molomot received \$382 in reimbursements for out-of-pocket expenses from the principal campaign committee, and 2) SSVC reimbursed Molomot's employer for that portion of Molomot's salary for his time spent on campaign related business during working hours. Molomot spent approximately 60% of his time on campaign business during working hours in April 1978, and 5% in May and June. All additional work time which Molomot spent campaigning was billed by the hour to the principal campaign committee by Molomot's employer. Because Molomot personally received reimbursement for out-of-pocket expenses and his employer was compensated by the principal campaign committee, these facts sustain the presumption that the expenditure for the Employees Committee advertisements were not independent.

33040411423

§ 434

Since the expenditures by Employees Committee are not independent within the meaning of the Act, the Committee's expenditures should be considered in-kind contributions to Short's campaign and should have been reported accordingly. Employees Committee's failure to report its financial activity in accordance with 2 U.S.C. § 434 places it in violation of that section. Therefore, it is recommended that the Commission find probable cause to believe a violation of 2 U.S.C. § 434(b) has been committed by the Employees Committee.


§ 441a:

Additionally, since the committee's expenditures in the amount of \$4,227 are considered in-kind contributions under the Act, the committee has exceeded the contribution limitations of § 441a. It is recommended that the Commission find probable cause to believe a violation of 2 U.S.C. § 441a has been committed by the Employees Committee.

III. Recommendation

1. Find probable cause to believe that the Employees of Bob Short Companies Committee has violated 2 U.S.C. §§ 434(b) and 441a.

21 April 1980
Date


Charles N. Steele
General Counsel

33040411426



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas H. Jensen
828 Midland Bank Building
401 Second Avenue, South
Minneapolis, Minnesota 55401

Re: MUR 812

Dear Mr. Jensen:

Based on a complaint filed with the Commission on November 2, 1978, the Commission determined on December 20, 1978, that there was reason to believe that the Employees of Bob Short Companies Committee may have violated sections 434(b), 433, 441d and 441a of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. 110.9(a) of the Commission's Regulations and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations of 2 U.S.C. § 434(b) and 441a have occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

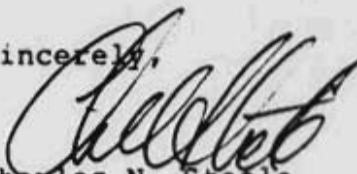
83040411427

Mr. Thomas H. Jensen
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

33040411428

83040411425

PS Form 3817, Aug. 1978

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on
reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery.
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Mr. Kevin Powers

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943018

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs. Powers
DATE OF DELIVERY 2-25-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

U.S. POSTAL SERVICE
FEB 25 1980
ST. LOUIS, MO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

U.P.O. 1670-572-502

MUR 812 (Callahan)



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Powers
735 East County Road B
St. Paul, Minnesota 55117

Re: MUR 812

Dear Mr. Powers:

On February 14, 1980, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434. Accordingly, the file has been closed in this matter as it pertains to you. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

If you have any questions, contact Suzanne Callahan at (202) 523-5071.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles W. Steele", is written over the typed name.

Charles W. Steele
General Counsel

Enclosure
Conciliation Agreement

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Powers
735 East County Road B
St Paul, Minnesota 55117

Re: MUR 812

Dear Mr. Powers:

On , 1980, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434. Accordingly, the file has been closed in this matter as it pertains to you. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation a attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

If you have any questions, contact Suzanne Callahan at (202) 523-5071.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

Handwritten:
JNC
2/15/80
JNC
2/15/80

83040411431

BEFORE THE FEDERAL ELECTION COMMISSION
October 15, 1979

ACC#
267

In the Matter of
Kevin Powers

866114

MUR 812

RECEIVED
FEDERAL ELECTION
COMMISSION

CONCILIATION AGREEMENT

'80 FEB 4 PM 3:18

This matter having been initiated by a signed, sworn and notarized complaint by Paul Overgaard, an investigation having been conducted, and reasonable cause to believe having been found that Kevin Powers ("Respondent") violated 2 U.S.C. § 434(b) by not filing F.E.C. Form #5 in a timely fashion;

NOW THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

- A. Respondent, Kevin Powers, was treasurer of a group of nineteen individuals who collectively made an independent expenditure on behalf of the Senate candidacy of Robert Short.
- B. Respondent expended \$686.40 for an advertisement placed in the Minneapolis, Minnesota, Catholic Bulletin on behalf of Robert Short.
- C. Respondent failed to file reports of receipts and expenditures with the Commission disclosing the \$686.40 expenditure.

83040411432

WHEREFORE, Respondent agrees:

V. Respondent's failure to file financial reports in a timely fashion with the Commission is in violation of 2 U.S.C. § 434(b).

VI. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

15 February 1980

Date



Charles N. Steele
General Counsel
Federal Election Commission

Jan 23 1980

Date



Kevin Powers

83040411433



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mc E*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: JANUARY 2, 1980
SUBJECT: OBJECTION - MUR 812 - General Counsel's
Report dated 12-14-79: Signed 12-28-79;
Received in OCS 12-21-79, 12:37

The above-named document was circulated on a 48
hour vote basis at 4:00, December 31, 1979.

Commissioner Reiche submitted an objection at 11:52
this date, thereby placing MUR 812 on the Executive
Session Agenda for January 8, 1980.

Attached is a copy of Commissioner Reiche's vote
sheet with comments regarding the objection.

ATTACHMENT:
Copy of Vote Sheet

3304041143



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 31, 1979

MEMORANDUM TO: Marjoire W. Emmons
FROM: Elissa T. Garr *EW*
SUBJECT: MUR 812

Please have the attached General Counsel's Report on MUR 812 distributed to the Commission on a 48 hour tally basis.

Thank you.

3304041143

79 DEC 31 12:37

ACCT# 11870

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING

401 SECOND AVE. SOUTH

MINNEAPOLIS, MINNESOTA 55402

RECEIVED
FEDERAL ELECTION
COMMISSION

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

AREA CODE 612
TELEPHONE 332-0337

DEC 13 AM 11:57

005340

December 10, 1979

Thomas J. Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR812 - Employees of Bob Short Companies Committee

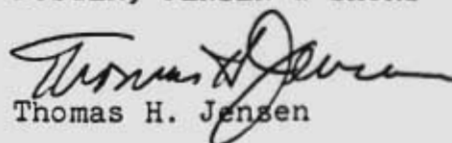
Dear Mr. Whitehead:

I am writing to advise you that my client in the above-referenced matter, Mr. Oscar Molomot, passed away on December 4, 1979.

I assume that you will now be closing your file on the above matter and would appreciate receiving written confirmation in that respect.

Very truly yours,

FOSTER, JENSEN & SHORT


Thomas H. Jensen

THJ/crw

96:218 31030 67

RECEIVED
GENERAL COUNSEL

83040411436



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas H. Jensen
828 Midland Bank Building
401 Second Avenue, South
Minneapolis, Minnesota 55401

MUR 812

Dear Mr. Jensen:

This is in reference to your letter of December 10, 1979.

Prior to our receipt of your letter, the Commission made the following determinations in connection with this matter:

- (1) take no further action against the Employees Committee with regard to its violation of 2 U.S.C. § 433 for registering as a political committee two days beyond the prescribed deadline;
- (2) reasonable cause to believe that the Employees Committee violated 2 U.S.C. § 434(b) for failure to report its disbursements as in-kind contributions to the Short campaign;
- (3) reasonable cause to believe the Employees Committee violated 2 U.S.C. § 441a by exceeding its contribution limitations;
- (4) no reasonable cause to believe the Employees Committee violated either 11 C.F.R. § 110.9(a) or § 441d;
- (5) require the Employees Committee to file amended reports reflecting the in-kind contributions made to the Short campaign; and
- (6) approved a conciliation agreement which it would offer as settlement of this matter which provided for a civil penalty of \$2,000.

The Commission's above-stated findings were based on the fact that the Employees Committee did not meet the criteria for independent expeditor status set forth in 2 U.S.C. § 431p (11 C.F.R. § 109).

83040411437

Thomas H. Jensen
Page 2

The Commission has determined that under the circumstances it will take no further action against the Employees Committee. However, the Commission has voted to require Larry Weisgram, treasurer of the Employees Committee, or some other authorized individual to file amended reports for the committee reflecting its disbursements as in-kind contributions to the Short for Senate Committee of Volunteers. The amended reports should be filed within thirty days or advise the Commission of your intentions in this matter. Upon receipt of the amended reports, I will recommend that the Commission close its file in this matter as it pertains to the Employees Committee.

Should you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter at 202/523-4035.

Sincerely,

Charles N. Steele
General Counsel

83040411455



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 28, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian P. Short
828 Midland Bank Building
401 2nd Avenue, South
Minneapolis, Minnesota 55401

Re: MUR 812

Dear Mr. Short:

In furtherance of its investigation into the above-referenced matter, the Commission requests that you provide certain information in addition to that provided by your testimony of June 19, 1979.

Please submit your response to the enclosed questions under oath, within five days of your receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3).

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

cc: Frank Walz

33040411433

QUESTIONS

Brian P. Short

You have testified that you prepared all of the financial disclosure reports filed with the Commission by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("JAB"). 1/ In this regard, please state, in detail, your responsibilities surrounding the preparation of financial reports for JAB. Your response should address the following:

1. A description of your bookkeeping procedures (i.e. whether you kept a continuous tally of JAB's outstanding bills as well as the committee's total assets);
2. A description of your involvement in JAB's bank transactions (i.e. whether you made deposits and authorized or made withdrawals);
3. Whether JAB contributions or copies of contributor information were forwarded to you for use in preparation of JAB reports;
4. From where financial information came, including JAB expenditures as well as contributor information;
5. A list of each individual involved in supplying JAB's financial transaction information to you;
6. Whether you ever kept any JAB documents or any written instruments concerning JAB at the principal campaign committee headquarters;
7. Whether you conducted any of your JAB activities whatever at the principal campaign committee headquarters;
8. A list of each location where you conducted any JAB business whatever;
9. A detailed explanation as to your knowledge of the JAB invoice in the amount of \$6,554.39 (Attachment I);

1/ Short deposition, June 19, 1979, Tr. p. 59.

33040411410

J.F.P. &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn. 55802 (218) 723-5500

November 6, 1978

FEC ATTACHMENT I
Inv. No. 10473

Your P. O. No. _____

Just A Bunch Of DFL Folks Who Want
Common Sense Government Committee
401 Midwest Federal Building
St. Paul, MN 55101

1934
pd

ob No.

1239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01
2691.52
958.86

\$ 6654.39

33040411441
RETURN DUPLICATE COPY WITH REMITTANCE

83040411413


SHORT FOR U.S. SENATE
VOLUNTEER COMMITTEE

1934

11/27 19 78 17-115
910

PAY TO THE ORDER OF JFP & Associates, Inc. \$ 6,654.39

Six Thousand Six Hundred and Fifty-Four Dollars and 39/100 DOLLARS

 NATIONAL CITY BANK
OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA 55402

51989101181

"001934" "091001157" 104 6136 "0000665439"

01 ACCOUNT NUM 104-6136 LIST OF CHECKS DATE 12/12/78 PAGE 1

BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT
0096	4,950.00	0116	65.96	0116	7,109.77	0160	35.00	0162	507.00
0223	1,026.97	0264	7,154.92	0265	114.96	0265	112.17	0271	440.47
0905	503.26	0853	6,654.39						

TOTAL NUMBER OF ITEMS 12

TOTAL DOLLAR AMOUNT

28,674.77

FEC ATTACHMENT II

1978

PAY ANT BANK FEES
FNB - MINNEAPOLIS
0910-0003-0

12
DEC

137

1978

PAY ANT BANK FEES
FNB - MINNEAPOLIS
0910-0003-0

12
DEC

1978

PAY TO THE ORDER OF
FNB - MINNEAPOLIS
0910-0003-0

DEC 1 1978

NATURAL

76241



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 2, 1979

Mr. Randall E. Johnson
Green Valley Office Center
6100 Green Valley Drive, Suite 170
Bloomington, Minnesota 55438

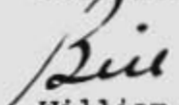
Dear Mr. Johnson:

This is in response to your letter of July 23, 1979.

As indicated to you in my letter of March 30, 1979, this office is not in a position to comment on the status of the complaint filed by Mr. Overgaard because the parties involved have not advised the Commission that they wish this matter to be made public.

We will, of course, advise Mr. Overgaard of the Commission's final determination in this matter.

Sincerely,


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 25, 1979

Leo J. Tibesar, Jr.
2260 Summit Avenue
St. Paul, Minnesota 55105

Dear Father Tibesar:

Pursuant to your request at your deposition, I am enclosing a copy of the Commission's notification letter sent to Kevin Powers on December 21, 1978, advising him of the initiation and basis of a Commission investigation concerning a political advertisement placed in the Catholic Bulletin. Additionally, I have enclosed a copy of the Federal Election Campaign Act and Commission regulations as it is our understanding that you were the individual who placed the advertisement.

Should you wish to respond to the Commission's reason to believe finding, please do so as soon as possible as we hope to make a report to the Commission within 30 days.

If you have any questions, please direct them to Suzanne Callahan at (202) 523-4529.

Sincerely,

A handwritten signature in cursive script, which appears to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosures
Letter
Act
Regulations

812
RCO#
10672

RANDALL E. JOHNSON
ATTORNEY-AT-LAW

SUITE 170, GREEN VALLEY OFFICE CENTER
8100 GREEN VALLEY DRIVE '79
BLOOMINGTON, MINNESOTA 55438
(612)348-3088

RECEIVED
FEDERAL ELECTION
COMMISSION

JUL 25 AM 11:50

July 23, 1979

903276

33040411447

Mr. Tom Whitehead
Assistant General Counsel
1325 K Street N.W.
Washington, D.C. 20463

Dear Tom:

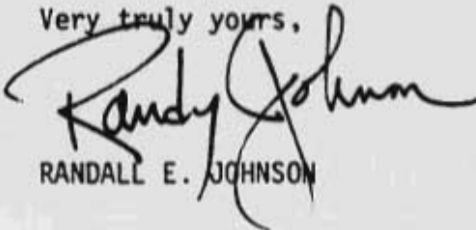
My clients, Paul Overgaard and the Durenberger Volunteer Committee, have again expressed concern about the apparent inaction on their complaint against the multiple violations of the Federal Election Campaign Act by 1978 U.S. Senate Candidate Bob Short and his supporters.

The complaint was filed about nine months ago. It is difficult to understand why this matter has not been resolved by taking the depositions of the involved persons, or by filing suit in District Court against them if they are not cooperating in providing the information you seek.

Although I know all too well the difficulties you face in enforcement actions, I think that nine months should be sufficient time either to conciliate this matter or bring suit.

Please advise me if my clients or I can be of assistance. I would rather not be the person who has to challenge the General Counsel's time limitation interpretation of 2 U.S.C. 437g(a)(9)(B)(ii).

Very truly yours,


RANDALL E. JOHNSON

REJ:mIm

cc: Paul Overgaard

21:20 52100 61

RECEIVED
GENERAL COUNSEL

83040411448

RANDALL E. JOHNSON
ATTORNEY-AT-LAW

SUITE 170, GREEN VALLEY OFC. CTR.
6100 GREEN VALLEY DRIVE
BLOOMINGTON, MN 55438



'79 JUL 25 AM 11:50

Mr. Tom Whitehead
Assistant General Counsel
1325 K Street N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1979

Mr. Randall E. Johnson
Green Valley Office Center
6100 Green Valley Drive, Suite 170
Bloomington, Minnesota 55438

Dear Mr. Johnson:

This is in response to your letter of March 20, 1979, in which you request information pertaining to the October 31, 1978, complaint filed by Paul Overgaard with the Commission.

As you are aware, Commission policy pursuant to 2 U.S.C. § 437g(a)(3) prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. Because there has been no written agreement that the matter be made public, we are not in a position to release any information at this time.

As Mr. Overgaard was informed by letter of November 2, 1978, (copy attached) we will notify him as soon as the Commission determines what action should be taken. We cannot, of course, advise you concerning your contemplated action pursuant to 2 U.S.C. § 437g(a)(9).

Sincerely,

William C. Oldaker
General Counsel

Enclosure



8.2
01724
GCM
9713

RANDALL E. JOHNSON
ATTORNEY-AT-LAW

RECEIVED
FEDERAL ELECTION
COMMISSION

SUITE 170, GREEN VALLEY OFFICE CENTER
8100 GREEN VALLEY DRIVE
BLOOMINGTON, MINNESOTA 55438
612/888-1890

'79 MAR 26 AM 9:06

March 20, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Dear Mr. Oldaker:

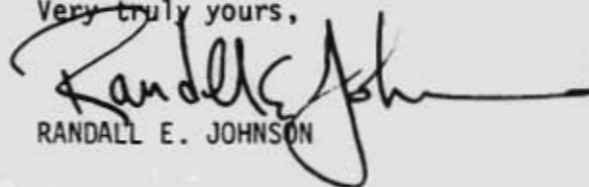
As we discussed when I met with you last week, I represent Mr. Paul P. Overgaard who filed a complaint with the Commission approximately four months ago. We do not have the MUR number assigned to the complaint nor were we advised of the filing date recognized by the Commission.

Mr. Overgaard has seen no indication that the Commission has acted upon his complaint. He has authorized me to file an action against the Commission pursuant to 2 U.S.C. 437g(a)(9) as soon as you inform us of the last date such an action may be filed.

Of course, if Mr. Overgaard can be satisfied that the Commission is acting expeditiously as required by 2 U.S.C. 437g(a)(3)(A), he will not desire to divert the Commission's attention away from its investigation by bringing court action.

Please feel free to contact me by telephone to expedite this matter.

Very truly yours,

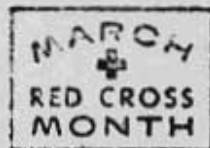

RANDALL E. JOHNSON

33040411450

8 3 0 4 0 4 1 1
1
RANDALL E. JOHNSON
ATTORNEY-AT-LAW

86
SUITE 170, GREEN VALLEY BFC. CTR.
6100 GREEN VALLEY DRIVE
BLOOMINGTON, MN 55408

RECEIVED
COMM. FILE
'79 MAR 22 AM



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 X Street NW
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS

MRE

DATE:

MARCH 21, 1979

SUBJECT:

MUR 812 - Interim Investigatory Report
dated 3-9-79: Signed 3-16-79;
Received in OCS 3-19-79, 11:34

The above-named document was circulated on a 24
hour no-objection basis at 12:00, March 20, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as of
1:00 this date.

3304011143

March 19, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812

Please have the attached Interim Invest Report
on MUR 812 distributed to the Commission.

Thank you.

8304041143

BEFORE THE FEDERAL ELECTION COMMISSION
March 9, 1979

In the Matter of)

Just a Bunch of Plain DFL Folks Who)
Want Common Sense Government)
Committee, et al.)

79 MAR 19 4:34
MUR 812

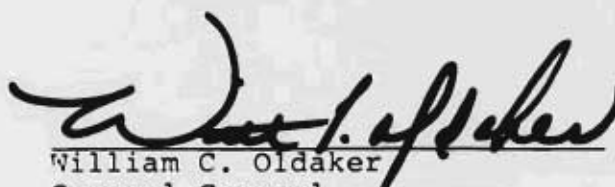
Interim Investigatory Report

The Commission has previously found reason to believe;

- (1) that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §§ 433, 434(b), 441a, 441d, 11 CFR 110.9(a) and 109.2(c),
- (2) that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §§ 433, 434(b), 441a, 441d, and 11 CFR 110.9(a),
- (3) that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §§ 434(b), 441b and 11 CFR 110.9(a),
- (4) that the Democrats, Republicans and Independents United for a Pro-Life Senate may have violated 2 U.S.C. §§ 433 and 441d, and
- (5) that the R.E. Short Company may have violated 2 U.S.C. § 441b.

All of the above-named respondents have submitted information relevant to the Commission's analysis of this matter. In preparation for future depositions, we have sent subpoenas to the St. Paul Dispatch and the Minneapolis Star and Tribune for documents which pertain to business transactions with the Just Bunch Committee and we have sent letters to several individuals who may have information relevant to our analysis of this matter.

Date: 3/16/79


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 9, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Earl Short
8 Merilane
Minneapolis, MN 55436

RE: MUR 812

Dear Mr. Short:

Enclosed is a copy of a letter sent by the Commission to Sharon Jensen, Chairman of your principal campaign committee, on February 7, 1979, and her response to that letter dated February 22nd.


As shown by the enclosed copy of Ms. Jensen's response, she does not have sufficient information with which to answer the questions sent to her. We would, therefore, appreciate you or one of your designated agents answering those questions within ten days of your receipt of this letter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4529.

Sincerely,

WILLIAM C. OLDAKER
GENERAL COUNSEL

BY:


Charles N. Steele
Associate General Counsel

Enclosures
Letter
Questions
Response

8 0 4 0 4 1 1 4 5 6



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sharon Jensen, Chairman
Short for Senate Committee
of Volunteers
2523 Stanbridge Avenue
St. Paul, MN 55113

Re: MUR 812

Dear Ms. Jensen:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by Robert Foster in his letter of January 4, 1979.

Please submit your response to the enclosed questions within ten days of receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a large, stylized flourish.

William C. Oldaker
General Counsel

Enclosure

3 30 40 1 1 1 4 5 7

QUESTIONS

THE SHORT FOR SENATE COMMITTEE OF VOLUNTEERS

1. State your position with the Short for Senate Committee of Volunteers (the Committee).
2. What were your duties in that capacity?
3. Please list the names of all individuals who were involved in any capacity whatever with the Committee (separated as to paid and volunteer workers).
4. Who was in charge of the fundraising activities of the committee?
5. List all individuals authorized at any time to receive or expend funds on behalf of the Committee. If those individuals were identified by fundraiser number or some other manner, please specify.
6. Under what conditions would an individual not on the Committee payroll be reimbursed for expenses from committee funds? Please describe the procedure used by an individual to receive reimbursement (i.e. Is it approved by someone? If so, whom?)
7. Who made the final decisions regarding campaign strategy in the committee?
8. We note that the committee used three separate offices in the campaign. Please indicate the organizational structure at each office including a statement as to the person who finalized or authorized all campaign strategy/activities.
9. State the capacity in which each of the following individuals were involved with the campaign regardless of whether the connection was as a paid employee, volunteer, consultant or otherwise:

John Angel
Kristine Kremer
Robert Foster
Oscar Molomot
Ann Knapp
H.P. Traum
Larry Weisgram
D. Wozniak
Walter Riordan
Karl Rolvaag
Peter Popovich
James Rice
Kevin Powers

10. Please list, in detail, any documentation and/or records kept by the Committee in connection with Mr. Short's campaign including but not limited to by-laws, contemporaneous memoranda, telephone logs, daily logs, and minutes of meetings.

11. Who is the present custodian of committee records?

12. In your response to questions 1 through 11, please differentiate between primary election and general election activity where appropriate.

83040411439

1333
St. Paul, Minn. 55115
February 22, 1979

William C. Aldaker,
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

(312)

Dear Mr. Aldaker,

In response to the questions set forth in the
enclosure to your letter dated February 7, 1979
regarding The Short for Senate Committee of
Volunteers:

1. Chairwoman.
2. No official duties.
3. There were many volunteers. I don't know all of their
names, but am sure rosters were kept that would
be available to the FEC.
4. I don't know.
5. I was not authorized to receive or expend funds.
I assume Robert Foster or some other individual
was responsible for this.
6. I don't know.
7. I don't know.
8. I don't know.
9. Robert Foster, Treasurer. I believe he was a volunteer.
I met Mr. Wozniak during the campaign, but I
don't know what, if any, duties he assumed. I
don't know how, or whether, any of the others
listed were involved with the campaign.
10. I wasn't the custodian of records. I've never
reviewed any of them, and I don't have access
to them.
11. I don't know.

33040411460

12. Question not applicable.

Sincerely,
Mrs. Sharon Jensen
Chairwoman
Staff for Senate
Committee of Volunteers

83040111461

02:59 06:03:20



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Otto Silha, President
Minneapolis Star and
Tribune Co.
424 Portland Ave., South
Minneapolis, MN 55488

Re: MUR 812

Dear Mr. Silha:

Enclosed is an order to submit written answers issued pursuant to Section 437d(a)(1) of Title 2, United States Code, and a subpoena to produce documents issued pursuant to Section 437d(a)(3) of the same Title. The order and the subpoena pertain to information and to documentation relevant to business and financial transactions between Minneapolis Star and Tribune and the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee.

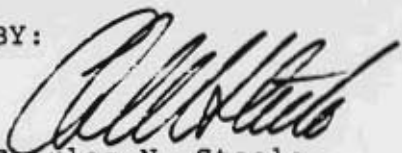
Please note that 2 U.S.C. § 437g(a)(3) prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. You are advised that no such written authorization has been made in this case.

Suzanne Callahan is the staff member assigned to the matter which gave rise to the issuance of the order and the subpoena. Please contact her at 202/523-4058 if you have any questions.

Sincerely,

William C. Oldaker
General Counsel

BY:


Charles N. Steele
Associate General Counsel

Enclosures
Subpoena
Order
Questions

89 040 111 462

83040411460

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Callahan 812

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1. The following service is requested (check one).
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 Show to whom and date delivered
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO *CHG 51/ha*
MA STAR & TRIBUNE
424 N. Highland Ave
Thurston, MA
03488

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
438058

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
Stewart Calvert

4. DATE OF DELIVERY
MAR 1 - 1979

5. ADDRESS. Complete only if requested.

6. UNABLE TO DELIVER BECAUSE

POSTMARK
 MAR 1 1979
 U.S. POST OFFICE
 STURTON, MA 03488
 SENDER'S INITIALS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Otto Silha, President
Minneapolis Star and
Tribune Co.
424 Portland Ave., South
Minneapolis, MN 55488

Re: MUR 812

Dear Mr. Silha:

Enclosed is an order to submit written answers issued pursuant to Section 437d(a)(1) of Title 2, United States Code, and a subpoena to produce documents ~~issued~~ pursuant to Section 437d(a)(3) of the same Title. The order and the subpoena pertain to information and to documentation relevant to business and financial transactions between Minneapolis Star and Tribune and the Just a Bunch of Plain DFL Folks who want Common Sense Government Committee.

Please note that 2 U.S.C. § 437d(a)(3) prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. You are advised that no such written authorization has been made in this case.

Suzanne Callahan is the staff member assigned to the matter which gave rise to the issuance of the order and the subpoena. Please contact her at 202/523-4058 if you have any questions.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

8304011145

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812
Folks Who Want Common)
Sense Government Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 16, 1979, the Commission approved by a vote of 5-0 the issuance of the order and subpoena, attached to the General Counsel's Memorandum dated February 13, 1979, to Mr. Otto Silha, President of the Minneapolis Star and Tribune Company, in furtherance of the investigation of the above-referenced matter.

Voting for this determination were Commissioners Aikens, Tiernan, McGarry, Thomson, and Harris.

Attest:

2/14/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 2-14-79, 10:21
Circulated on 48 hour vote basis: 2-14-79, 4:30

33040411462



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: FEBRUARY 21, 1979
SUBJECT: SUBPOENAS AND ORDERS IN RELATION TO
MUR 812

The attached subpoenas and orders, approved
February 16, 1979, have been signed and sealed this
date.

ATTACHMENTS:
Subpoenas - Silha, Ridder
Orders - Silha, Ridder

83040111466

February 14, 1979

MEMORANDUM TO: Marge Eamons
FROM: Elissa T. Garr
SUBJECT: MUR 812

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis.

Thank you.

83040111467

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee) MUR 812

SUBPOENA

TO: Mr. Otto Silha, President
Minneapolis Star and Tribune Co.
424 Portland Ave., South
Minneapolis, MN 55488

PURSUANT to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all books, records, memoranda and other written materials in your possession which pertain to any business and financial transactions between the Minneapolis Star and Tribune Co. and the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee in 1978. Such materials include, but are not limited to, contracts, work orders, written estimates, invoices and bills.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within ten days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

813040111468

Page 2

Subpoena to: Mr. Otto Silha, President
Minneapolis Star and Tribune Co.

WHEREFORE, the Chairman of the Federal Election
Commission has hereunto set her hand in Washington, D.C.,
on this *21st* day of *February*, 1979.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

3 3040411465

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee) MUR 812

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mr. Otto Silha, President
Minneapolis Star and Tribune Co.
424 Portland Ave., South
Minneapolis, MN 55488

PURSUANT to 2 U.S.C. § 437d(a)(1), and in furtherance
of its investigation in the above-styled matter, the Federal
Election Commission hereby orders you to submit written
answers to the questions attached to this Order.

Such answers must be submitted under oath and must be
forwarded to the Commission within ten days of your receipt
of this Order.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set her hand in Washington, D.C., on this *2nd* day
of *February*, 1979.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

83040411470

QUESTIONS

According to reports filed with the Federal Election Commission, the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (hereinafter "the Committee") made expenditures of \$2,833.18 and \$1747.93 on October 28th and made expenditures of \$2084.07 and \$5390.59 on November 2, 1978. With the exception of question 1, all the following questions pertain to those transactions.

1. Please state your name and the position you hold with the Minneapolis Star and Tribune Company.
2. Did the Committee make the expenditures listed above; were those expenditures made on the dates noted?
3. What goods or services were provided for these expenditures?
4. When were you first contacted by an agent of the committee with reference to providing these goods and services?
5. Who contacted you on behalf of the committee?
6. Who acted on behalf of the Minneapolis Star and Tribune Company?
7. In the initial negotiations, did the representative of the Committee specify an amount of money he wished to spend, or did he specify the quantity of goods he wished to purchase?
8. Was the Committee ever provided with an estimate as to the costs of those goods or services? If so, when? How much?
9. Did the goods or services provided include the design and layout of the ads?
10. When were you given authority to begin printing?
11. When did printing begin?
12. What were the terms of payment (i.e., payment in advance; payment on delivery; payment at some later date)?

83040411471



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

79 FEB 14 A10: 21

February 13, 1979

MEMORANDUM

TO: The Commissioners
FROM: William C. Oldaker
SUBJECT: MUR 812

Attached, for the Commission's approval, is an order and subpoena to be issued to Mr. Otto Silha, President of the Minneapolis Star and Tribune Company, in furtherance of our investigation of the above-referenced matter. We expect the response to the attached subpoena and order to facilitate our preparation for deposition of respondents in this case.

3304041147

AUTHORIZATION TO ISSUE A SUBPOENA AND ORDER
TO FACILITATE THE INVESTIGATION OF MUR 812

The Commission hereby authorizes a subpoena and order to
be issued to:

Mr. Otto Silha, President
Minneapolis Star and Tribune Co.
424 Portland Ave., South
Minneapolis, MN 55488

Joan D. Aikens
Chairman

William L. Springer
Commissioner

Robert O. Tiernan
Vice Chairman

Vernon W. Thomson
Commissioner

Thomas E. Harris
Commissioner

John W. McGarry
Commissioner

8304041147



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bernard H. Ridder, President
St. Paul Dispatch and Pioneer
Press
55 East 4th
Minneapolis, MN 55101

Re: MUR 812

Dear Mr. Ridder:

Enclosed is an order to submit written answers issued pursuant to Section 437d(a)(1) of Title 2, United States Code, and a subpoena to produce documents issued pursuant to Section 437d(a)(3) of the same Title. The order and the subpoena pertain to information and to documentation relevant to business and financial transactions between the St. Paul Dispatch and Pioneer Press and the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee.

Please note that 2 U.S.C. §437g(a)(3) prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. You are advised that no such written authorization has been made in this case.

Suzanne Callahan is the staff member assigned to the matter which gave rise to the issuance of the order and the subpoena. Please contact her at 202/ 523-4058 if you have any questions.

Sincerely,

William C. Oldaker
General Counsel

BY:

Charles N. Steele
Associate General Counsel

Enclosures
Subpoena
Order
Questions

8304041147

83040411475

Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3
Add your address in the RETURN TO space on reverse

1. The following service is requested (check one).
☐ Show to whom and date delivered.
☒ Show to whom, date, and address of delivery.
☐ RESTRICTED DELIVERY Show to whom and date delivered.
☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO *Bernard Riddick*
55 East 4th
Ma. Ma 55101

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
438059

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
J. Holmstedt

4. DATE OF DELIVERY
MAR 1 - 1979

5. ADDRESS Complete only if requested

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆GPO 1977-0-248-686

Callahan 812

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bernard H. Ridder, President
St. Paul Dispatch and
Pioneer Press
55 East 4th
Minneapolis, MN 55101

Re: MUR 812

Dear Mr. Ridder:

Enclosed is an order to submit written answers issued pursuant to Section 437d(a)(1) of Title 2, United States Code, and a subpoena to produce documents issued pursuant to Section 437d(a)(3) of the same Title. The order and the subpoena pertain to information and to documentation relevant to business and financial transactions between the St. Paul Press and The Just a Bunch of Plain DFL Folks who want common sense Government Committee.

Please note that 2 U.S.C. § 437g(a)(3) prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. You are advised that no such written authorization has been made in this case.

Suzanne Callahan is the staff member assigned to the matter which gave rise to the issuance of the order and the subpoena. Please contact her at 202-523-4058 if you have any questions.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

93040411476

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812
Folks Who Want Common)
Sense Government Committee)

SUBPOENA

To: Mr. Bernard H. Ridder, President
St. Paul Dispatch and
Pioneer Press
55 East 4th
Minneapolis, MN 55101

PURSUANT To 2 U.S.C. §437d(a)(3), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby subpoenas all books, records, memoranda and other written materials in your possession which pertain to any business and financial transactions between St. Paul Dispatch and Pioneer Press and the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee in 1978. Such materials include, but are not limited to, contracts, work orders, written estimates, invoices and bills.

Notice is given that these materials must be submitted to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within ten days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of documents, may be substituted for originals.

83040-111477

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set her hand in Washington, D.C., on this, *21st*
day of *February*, 1979.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

33040411478

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812
Folks Who Want Common)
Sense Government Committee)

ORDER TO SUBMIT WRITTEN ANSWERS

To: Mr. Bernard H. Ridder, President
St. Paul Dispatch and
Pioneer Press
55 East 4th
Minneapolis, MN 55101

PURSUANT to 2 U.S.C. §437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within ten days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C., on this, the *21st* day of *February*, 1979.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

83040411479

QUESTIONS

According to reports on file with the Federal Election Commission, the just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (hereafter "the Committee") made an expenditure of \$1,611.90 on October 28, 1978 and expenditures of \$1,211.69 and \$2,310.46 on November 2, 1978 to the St. Paul Dispatch and Pioneer Press. With the exception of Question 1, all the following questions pertain to those transactions.

1. Please state your name and the position you hold with the St. Paul Dispatch and Pioneer Press.
2. Did the Committee make the expenditures listed above; were those expenditures made on the dates noted?
3. What goods or services were provided for these expenditures?
4. When were you first contacted by an agent of the Committee with reference to providing these goods and services?
5. Who contacted you on behalf of the committee?
6. Who acted on behalf of the St. Paul Dispatch and Pioneer Press?
7. In the initial negotiations, did the representative of the Committee specify an amount of money he wished to spend, or did he specify the quantity of goods he wished to purchase?
8. Was the Committee ever provided with an estimate as to the costs of those goods or services? If so, when? How much?
9. Did the goods or services provided include the design and layout of the ads?
10. When were you given authority to begin printing?
11. When did printing begin?
12. What were the terms of payment (i.e., payment in advance; payment on delivery; payment at some later date)?

33040111430

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812
Folks Who Want Common)
Sense Government Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 16, 1979, the Commission approved by a vote of 5-0 the issuance of the order and subpoena, attached to the General Counsel's Memorandum date February 13, 1979, to Mr. Bernard H. Ridder, President of the St. Paul Dispatch and Pioneer Press, in furtherance of the investigation of the above-referenced matter.

Voting for this determination were Commissioners Aikens, Tiernan, McGarry, Thomson, and Harris.

Attest:

2/16/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 2-14-79, 10:21
Circulated on 48 hour vote basis: 2-14-79, 4:30

33040411431

February 14, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis.

Thank you.

3304011143



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER OF EASY

79 FEB 14 A10: 21

February 13, 1979

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker

SUBJECT: MUR 812

Attached, for the Commission's approval, is an order and subpoena to be issued to Mr. Bernard H. Ridder, President of the St. Paul Dispatch and Pioneer Press, in furtherance of our investigation of the above-referenced matter. We expect the response to the attached subpoena and order to facilitate our preparation for deposition of respondents in this case.

8304011433

AUTHORIZATION TO ISSUE A SUBPOENA AND ORDER
TO FACILITATE THE INVESTIGATION OF MUR 812

The Commission hereby authorizes a subpoena and order
to be issued to:

Mr. Bernard H. Ridder, President
St. Paul Dispatch and Pioneer Press
55 East 4th
Minneapolis, MN 55101

Joan D. Aikens
Chairman

William L. Springer
Commissioner

Robert O. Tiernan
Vice Chairman

Vernon W. Thomson
Commissioner

Thomas E. Harris
Commissioner

John W. McGarry
Commissioner

630401143

83040411405

Callahan 812

U.S. Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered.
☒ Show to whom, date, and address of delivery.
☐ RESTRICTED DELIVERY Show to whom and date delivered.
☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO *Lynn Powers*
735 E. C. Rd. B.
St Paul, MN 55117

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
438001

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE ☒ Addressee ☐ Authorized agent
X Mrs. K. Powers

4. DATE OF DELIVERY *2-20-79*

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆GPO: 1977-0-249 506





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Powers, Treasurer
735 E. Co. Rd. B.
St. Paul, MN 55117

Re: MUR 812

Dear Mr. Powers:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by your letter of January 22, 1979.

Please submit your response to the enclosed questions within ten days of receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosure

8304041148

QUESTIONS

1. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?
2. Did you or any other signators of the ad discuss or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
3. Did Mr. Short or any of his authorized agents offer any suggestions in regard to your groups activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
4. Were any of the signators of the advertisement involved in prior activity on behalf of Mr. Short? If so, please identify who was so engaged, in what capacity, and on what dates. ("prior campaign activity" includes paid staff, volunteers, consultants or any activity whatever on behalf of Mr. Short)
5. In your response of January 22, you state that the signators of the ad agreed by consensus to place an advertisement in the Catholic Bulletin. In this regard;

Who originated the idea of placing an advertisement on behalf of Robert Short?

In what manner were the signators of the advertisement solicited for contributions to pay for the advertisement? Who collected the funds?

In what manner were the contributions received? (i.e., cash or check)

Who designed the layout for the advertisement?

Who contacted the Catholic Bulletin regarding the placing of the advertisement?

Who finalized the agreement with the Catholic Bulletin to run the advertisement?

If any individual or group other than the signators of the advertisement made contrirubtions, please indicate.

83040411487



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oscar Molomot, Chairman
Employees of Bob Short
Companies Committee
2950 Dean Parkway
Minneapolis, MN 55416

Re: MUR 812

Dear Mr. Molomot:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by your letter of January 3, 1979.

Please submit your response to the enclosed questions within ten days of receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



8 3 0 4 0 4 1 1 4 3 9

PS Form 3811 Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

Palmer 212

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 Show to whom and date delivered
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *Cecil Melonut*
2932 Dear PKW
Minneapolis, MN 55416

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
438000


(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
[Signature]

4. DATE OF DELIVERY
2 20 79

5. ADDRESS: Complete only if requested.

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



QUESTIONS

1. Please detail any and all solicitation efforts or meetings, in which you were in any way involved, concerning the Employees of Bob Short Companies Committee. This should include, but is not limited to your speaking with:
 - (a) the employees of the truckline at its Minneapolis General Headquarters;
 - (b) terminal managers of the truckline during regular sales meetings; and
 - (c) meeting of employees of the Hotel Leamington.

In your response to the above, please include the dates, times, places and number of individuals in attendance, as well as the name of the company official who authorized the meetings to take place.

2. Please state the name(s) and addresse(s) of any individual(s) who you know to have participated in solicitation efforts in connection with the Employees of Bob Short Companies Committee. Your response should include but is not limited to the solicitation efforts of "terminal managers" which you mentioned in your letter.
3. Please list all reimbursements or any payments of money whatever, which you have received from the Short for Senate Committee of Volunteers and state the purpose of each such payment.

83040411490



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 7, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sharon Jensen, Chairman
Short for Senate Committee
of Volunteers
2523 Stanbridge Avenue
St. Paul, MN 55113

Re: MUR 812

Dear Ms. Jensen:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by Robert Foster in his letter of January 4, 1979.

Please submit your response to the enclosed questions within ten days of receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

83040411491

QUESTIONS

THE SHORT FOR SENATE COMMITTEE OF VOLUNTEERS

1. State your position with the Short for Senate Committee of Volunteers (the Committee).
2. What were your duties in that capacity?
3. Please list the names of all individuals who were involved in any capacity whatever with the Committee (separated as to paid and volunteer workers).
4. Who was in charge of the fundraising activities of the committee?
5. List all individuals authorized at any time to receive or expend funds on behalf of the Committee. If those individuals were identified by fundraiser number or some other manner, please specify.
6. Under what conditions would an individual not on the Committee payroll be reimbursed for expenses from committee funds? Please describe the procedure used by an individual to receive reimbursement (i.e. Is it approved by someone? If so, whom?)
7. Who made the final decisions regarding campaign strategy in the committee?
8. We note that the committee used three separate offices in the campaign. Please indicate the organizational structure at each office including a statement as to the person who finalized or authorized all campaign strategy/activities.
9. State the capacity in which each of the following individuals were involved with the campaign regardless of whether the connection was as a paid employee, volunteer, consultant or otherwise:

John Angel
Kristine Kremer
Robert Foster
Oscar Molomot
Ann Knapp
H.P. Traum
Larry Weisgram
D. Wozniak
Walter Riordan
Karl Rolvaag
Peter Popovich
James Rice
Kevin Powers

33040111492

10. Please list, in detail, any documentation and/or records kept by the Committee in connection with Mr. Short's campaign including but not limited to by-laws, contemporaneous memoranda, telephone logs, daily logs, and minutes of meetings.

11. Who is the present custodian of committee records?

12. In your response to questions 1 through 11, please differentiate between primary election and general election activity where appropriate.

83040411493

8 3 0 4 0 4 1 1 4 9 4

CALLAHAN 812

PS Form 3811 Apr 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one).
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 Show to whom and date delivered
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO: *James
Shaw for Senator
2523 Cambridge Ave
St Paul MN 55113*

3 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
943958

(Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE ☐ Addressee ☐ Authorized agent

4 DATE OF DELIVERY *2/18/79* POSTMARK

5 ADDRESS Complete only if requested

6 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sharon Jensen, Chairman
Short for Senate Committee
of Volunteers
2523 Stanbridge Avenue
St. Paul, MN 55113

2/8/79

Re: MUR 812

Dear Ms. Jensen:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by Robert Foster in his letter of January 4, 1979.

Please submit your response to the enclosed questions within ten days of receipt of this letter, as well as any other factual or legal material which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. Should you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

15/

William C. Oldaker
General Counsel

Enclosure

January 23, 1979

TO: WILLIAM OLDAKER
ATTENTION: SUZANNE CALLAHAN
THROUGH: ORLANDO B. POTTER *OR*
FROM: TOM HASELHORST *TH*
SUBJECT: MUR 812

Reports Analysis will send out the attached RFAI's to the committee involved in the above mentioned MUR 812, unless objected to. Please respond by 1/26/79.

33040411496



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

Mr. Larry Weisgram, Treasurer
Employees of Bob Short Companies
2950 Dean Parkway
Minneapolis, MN 55404

Dear Mr. Weisgram:

This letter is prompted by our interest in assisting Senate candidates and committees who wish to comply with the Federal Election Campaign Act.

During review of the 30 Day & Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Secretary of the Senate, Office of Public Records, 119 D Street, N.E., Washington, D.C. 20510, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Susan Weber in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Attachment
FEC Form 12



FEDERAL ELECTION COMMISSION

SL/5

1325 K Street, N.W.
Washington, D.C. 20463TO: EMPLOYEES OF BOB SHORT COMPANIES/ MN

DATE: _____

I.D. NO.: C99000861

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 Day Post-Gen Termin REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10/18/78 THROUGH 11/2/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☐ Signature: ☐ omitted ☐ inadequate
- 11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.*
- ☒ Other: Please submit a Detailed Summary Schedule of Receipts and Expenditures
(Page 2) and any supporting schedules of itemization if necessary.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

51/5

TO: EMPLOYEES OF BOB SHORT COMPANIES/ MN

DATE: _____

I.D. NO.: C99000861

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10/18/78 THROUGH 12/22/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

☒ Coverage Dates: ☐ omitted or ☒ incorrect

☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____

☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule

☐ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: The last report filed by you covered the period 10/18/78 through 11/2/78.

This report covers the period from 10/18/78 through 12/22/78. Please amend your report by disclosing only activity from 11/3/78 on. (See page two)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

EMPLOYEES OF DOB SHORT COMPANIES

REQUEST FOR ADDITIONAL INFORMATION

PAGE TWO

(Continued from page one)

The ending cash figure for your previous report was \$282.44. However, on your termination report you disclose a beginning cash figure of \$0. Please amend your report to explain the discrepancy.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 19, 1979

MEMORANDUM

TO: Tom Haselhorst
THROUGH: Orlando Potter
FROM: Bill Oldaker *Bill*
SUBJECT: MURs 812, 818, and 853

This is to advise you that there are currently three MURs numbered 812, 818, and 853 which involve Bob Short's campaign (MN/S) and committees acting on his behalf.

In order that duplication not occur between RAD and OGC, please coordinate any communications (i.e. RFAI's and SV letters) with this office prior to the sending of notification letters.

83040411531



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *mwe*

DATE:

JANUARY 16, 1979

SUBJECT:

MUR 812 (78) - Interim Investigative
Report dated 1-10-79, Signed 1-12-79
Received in OCS 1-12-3:21 (Friday)

The above-named document was circulated on a 24
hour no-objection basis at 3:30, Monday, January 15, 1978.

The Commission Secretary's Office has received
no objections to the Interim Investigative Report as of
4:00 this date.

83040111502

January 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812

Please have the attached Interim Invest Report on
MUR 812 distributed to the Commission.

Thank you.

33040411503

RECEIVED
OFFICE OF THE
COMMISSIONER
JAN 12 1979

BEFORE THE FEDERAL ELECTION COMMISSION
January 10, 1979

JAN 12 P 3: 21

In the Matter of)

Just a Bunch of Plain DFL Folks)

Who Want Common Sense Government)

Employees of Bob Short Companies Committee)

Short for Senate Committee of Volunteers)

Democrats, Republicans, Independents United)

for a Pro-Life Senate)

R. E. Short Company)

Kevin Powers)

MUR 812 (78)

INTERIM INVESTIGATIVE REPORT

On December 20, 1978, the Commission made the following
determinations in connection with the above referenced matter:

1. Reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign;
2. Reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) their expenditures were made;
3. Reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short Campaign which exceeded the limitations of that section;
4. Reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion;
5. Reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements;

33040111504

6. Reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign;
7. Reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion;
8. Reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceeded the limitation of that section;
9. Reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements;
10. Notify the Employees of Bob Short Companies Committee to amend its reports as follows;
 - a. file a summary page which would indicate the source of committee funds;
 - b. inform the Commission as to the disposition of the Committee's residual funds;
11. Reason to believe that the Bob Short for Senate Committee of Volunteers, the Just A Bunch Committee and the Employees Committee may have violated 11 C.F.R. 110.9(a) by accepting contributions in excess of the limitations in 2 U.S.C. §441a;
12. Reason to believe that the Bob Short for Senate Committee of Volunteers and the R. E. Short Company may have violated 2 U.S.C. §441b by entering into a rental agreement for office space outside the ordinary course of business;
13. Reason to believe that the Bob Short for Senate Committee of Volunteers may have violated 2 U.S.C. §441b by using corporate WATS lines for campaign purposes;

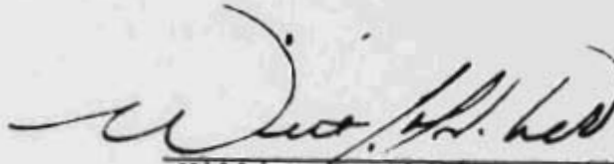
3304011503

14. Reason to believe that the Bob Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions;
15. No reason to believe that the Bob Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) by failing to report the payment of federal withholding taxes;
16. No reason to believe that either the Bob Short for Senate Volunteer Committee or the Democrats, Republicans, and Independents United for a Pro-Life Senate may have violated 2 U.S.C. §434 for improperly reporting a transfer between the two committees;
17. Reason to believe that Kevin Powers may have violated 2 U.S.C. §434 for failure to file disclosure reports;
18. Authorized the postponement of a determination as to whether §441a(f) violations have been committed until the conclusion of an investigation of the above-mentioned violations;

As of this writing, we have received responses to most of our notification letters.

We are currently analyzing those responses and will make a recommendation to the Commission as soon as possible.

1/12/79
Date


William C. Oldaker
General Counsel

33040111503

54

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH MICHIGAN STREET
MINNEAPOLIS, MINNESOTA 55402

(612) 341-3800
TELEX 29-0584
TELECOPIER 612 341-3800 (256)

PASEO DE LA CASTELLANA, 6
MADRID 1, SPAIN
276-5524
TELEX 23802 FALW E**

DAVID BURLINGAME
MARTIN M. BERLINER
GREGORY A. KEARNS
SUITE 1100 SECURITY LIFE BUILDING
1616 GLENARM PLACE
DENVER, COLORADO 80202
(303) 573-7737

SUITE 800
1919 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
EDWARD W. BROOKER
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
DAVID R. MELINCOPF
DELANCEY W. DAVIS
RICHARD S. MORGAN
PHILIP R. HOCHBERG
THOMAS V. VAREKIS
DOUGLAS M. CARNIVAL
TERENCE R. BOYLE
HOPE S. FOSTER
BRIAN R. RHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. CONLON
DONALD S. ARBOUR
PETER C. KISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON R. GAYER
ROBERT J. STEELE
CHRISTINA W. FLEPS
MICHAEL E. VEVE
MARTHA PRIDDY PATTERSON
JAMES H. HOLT

OF COUNSEL
JOSEPH P. CASTIELLO
FRED O. THOMPSON
JOHN H. HOLLOWAY III

NOT MEMBER OF MINNESOTA BAR

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER
MICHAEL E. MCQUIRE
RICHARD L. POST
KENNETH B. JONES, JR.
ROBERT J. CHRISTIANSON, JR.
CHARLES E. FAORE
FRANK J. WALZ
JAMES R. DORSEY
ANDREW J. SHEA
DOUGLAS W. MCWILLAN
CHARLES D. REITE
WILLIAM R. MCGRANN
WALTER C. PARRINS
KENT E. RICHEY
JAMES OTIS REYER
JOHN J. SOMMERVILLE
JAMES A. RUBENSTEIN
NANCY F. FOWLER
JEREMIAH J. KEARNEY
THOMAS R. SHERAN
JOHN A. BURTON, JR.
ROBERT A. BRUNIO
FREDERICK W. MORRIS
WILLIAM E. FLYNN
RANDOLPH J. MAYER

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL
F. JAVIER FABREGAT

January 9, 1980

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Steele:

I have reviewed your letter of December 31, 1979, have discussed it with our client, and have discussed it further with Suzanne Callahan of your staff.

As I indicated to Ms. Callahan, I think it is unfair to expect the Short Committee to respond to your letter, as a proposed disposition of the complaint against it, without being apprised of the factual basis for the Commission's conclusion that the expenditures of the Just a Bunch Committee and the Employees Committee were not "independent", and were therefore somehow reportable by the Short Committee, and without being further apprised of the Commission's proposed course of action with respect to the Just a Bunch and Employees Committees.

We simply cannot operate in the vacuum which presently exists. Nor do we see how conciliation efforts can be conducted in good faith by the Commission on the basis of your assertions of its bare legal conclusion.

Please advise.

Yours very truly,

Frank J. Walz
Frank J. Walz

FJW:emw

3304011507

8304041508

O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

RECEIVED
FEDERAL ELECTION
COMMISSION

60 JAN 1 PM 12:05

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

300#
11870

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55409

FEDERAL ELECTION
COMMISSION

AREA CODE 612
TELEPHONE 332-0337

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

DEC 13 AM 11:57

005340

December 10, 1979

Thomas J. Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR812 - Employees of Bob Short Companies Committee

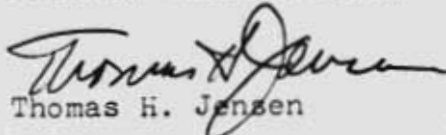
Dear Mr. Whitehead:

I am writing to advise you that my client in the above-referenced matter, Mr. Oscar Molomot, passed away on December 4, 1979.

I assume that you will now be closing your file on the above matter and would appreciate receiving written confirmation in that respect.

Very truly yours,

FOSTER, JENSEN & SHORT


Thomas H. Jensen

THJ/crw

33040411333

96:21d 81030 67

RECEIVED
FEB 1 1980

FOSTER, JENSEN & SHORT
ATTORNEYS AT LAW
18 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

RECEIVED
FEDERAL ELECTION
COMMISSION



79 DEC 13 AM 11:57

Thomas H. Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D.C. 20463

3040411

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402

(612) 341-3800

TELEX 29-0584

TELECOPIER 612 341-3800 (256)

PASEO DE LA CASTELLANA, 8
MADRID 1, SPAIN
276-5524
TELEX 23802 FALW E**

DAVID BURLINGAME
MARTIN M. BERLINER
GREGORY A. KEARNS
SUITE 1100 SECURITY LIFE BUILDING
1616 GLENARM PLACE
DENVER, COLORADO 80202
(303) 573-7737

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. McGUIRE
RICHARD L. POST
KENNETH B. JONES, JR.
ROBERT J. CHRISTIANSON, JR.
CHARLES B. FAZORE
FRANK J. WALE
JAMES R. DORSET
ANDREW J. SHEA
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CHARLES D. REITE
WILLIAM R. McGRANN
WALTER C. PARRINS
RENT E. RICHY
JAMES OTIS REVER
JOHN J. SOMMERVILLE
JAMES A. RUBENSTEIN
NANCY F. FOWLER
JEREMIAH J. KEARNEY
THOMAS R. SHERAN
JOHN A. BURTON, JR.
ROBERT A. BRUNIO
FREDERICK W. MORRIS
WILLIAM E. FLYNN
RANDOLPH J. HAYER

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL**
F. JAVIER FABREGAT

SUITE 800
1919 PENNSYLVANIA AVE., N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
EDWARD W. BROOKS
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
DAVID R. MELINCOPF
DELANCEY W. DAVIS
RICHARD G. MORGAN
PHILIP R. HOCHBERG
THOMAS V. VAKERIC
DOUGLAS M. CARNIVAL
TERENCE R. BOYLE
HOPE S. FOSTER
BRIAN P. RHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. CONLON
DONALD S. ARBOUR
PETER C. KISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON K. GAYEN
ROBERT J. STEELE
CHRISTINA W. FLEPS
MICHAEL E. VEVE
MARTHA PRIDD PATTERSON
JAMES H. HOLT

OF COUNSEL
JOSEPH F. CASTIELLO
FRED O. THOMPSON
JOHN H. HOLLOWAY III

NOT MEMBER OF MINNESOTA BAR

October 8, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

Enclosed please find a letter dated October 5, 1979 from Brian Short to you, together with Brian Short's affidavit of the same date, being provided in response to your letter request dated September 28, 1979, and the list of questions which accompanied that request. I asked Brian to deliver the enclosures to me for my review prior to their submission.

I have a few additional comments to offer concerning the records of the Just a Bunch Committee, and some additional bits of information concerning the J.F.P. Associates, Inc. invoices in question, which were provided to me by J.F.P. at my request.

First, with respect to the several questions you posed concerning the records of the Just a Bunch Committee, and Brian Short's performance of services to the Committee in the preparation of its reports to the Commission, I think it is important to bear in mind that the Just a Bunch Committee was a spontaneous creation of essentially two weeks' duration at the tail end of a

91:114 11130 62

Mr. William C. Oldaker
Page 2
October 8, 1979

general election campaign, not the carefully-planned and structured campaign organization which some of your questions would seem to contemplate.

Next, the records of the Just a Bunch Committee which were in Brian Short's possession, and which he has said were at all times maintained in his law office, were made available to you and your staff in June, in their entirety. Those records are presently in my custody, intact, and continue to be available for inspection. It is fair to say, however, that in reviewing those records, I find no J.F.P. invoice to Just a Bunch, or any other record of any transaction between J.F.P. and Just a Bunch, among them. As you will see from his affidavit, Brian Short first saw the J.F.P. invoice to Just a Bunch in June of this year. More specifically, he first saw it when it was shown to him at my request when a question was first raised concerning the invoice at the time of Fred Gates' deposition.

Next, your question number 9 refers to a Just a Bunch invoice "in the amount of \$6,554.39." The invoice itself is in the amount of \$3,004.01, and contains separate handwritten notations of two additional amounts, namely, \$2,691.52 and \$958.86. The latter two amounts, as I believe Fred Gates testified, and as it turns out, represent the amounts of two other J.F.P. invoices, not to Just a Bunch, but to the Short Committee.

Following my receipt of a copy of your questions to Brian Short, I called J.F.P. and requested copies of the invoices themselves, together with copies of the media schedules which reflect what the invoices were for. Those copies, as received from J.F.P., are enclosed for your information.

As you will see, the invoice to the Short Committee for \$2,691.52 is dated October 1978, and represents the Short Committee's pro rata share of the cost of a series of newspaper ads run jointly in a number of northern Minnesota newspapers with two other committees supporting Democratic candidates. The invoice to the Short Committee for \$958.86, also dated October 1978, likewise represents the Short Committee's pro rata share of joint newspaper ads in northern Minne-

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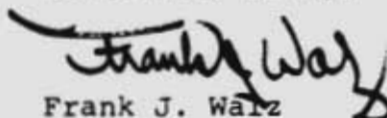
Mr. William C. Oldaker
Page 3
October 8, 1979

sota newspapers on behalf of several Democratic candidates. The third invoice, the invoice dated November 6, 1978 to Just a Bunch, represents charges for several radio and TV spots purchased on Duluth and Hibbing, Minnesota radio and television stations.

While I do not pretend to be much of a sleuth, I have a growing hunch that this entire matter may have developed by someone at J.F.P. inadvertently forwarding all three invoices to the Short Committee. It is clear to me, in any event, that the Short Committee paid all three invoices with one check, without noticing that one of the invoices was directed to Just a Bunch, and that the Short Committee's payment of the latter invoice was wholly unintentional and inadvertent.

If I can be of any further assistance in this matter, please advise.

Yours very truly,


Frank J. Walz

FJW:emw

enclosures

93040411513

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

AREA CODE 612
TELEPHONE 332-0337

October 5, 1979

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Oldaker:

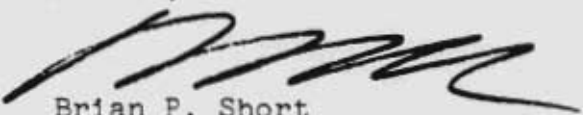
Enclosed, in affidavit form, are my answers to the questions which accompanied your letter of September 28, 1979.

The second paragraph asks that I submit other "factual or legal material" which I "deem relevant to the Commission's investigation of this matter."

I believe I have fully and adequately responded to each and every inquiry which the Commission has directed to me. I am not aware of any other material you might find helpful. If, however, there is anything else which you, or any member of your staff, believe pertinent and which I can supply, please let me know.

Sincerely,

FOSTER, JENSEN & SHORT


Brian P. Short

BPS/1k
Enclosure

STATE OF MINNESOTA
SS.
COUNTY OF HENNEPIN

Brian P. Short, being first duly sworn upon oath, deposes and says:

1. On October 1, 1979, a letter dated September 28, 1979 from William C. Oldaker was received in my office. I did not see this letter until late that evening or the next morning.

2. The following are my responses to the questions which accompanied that letter:

Summary

The Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee did not to the best of my knowledge, have any formal bookkeeping system. All bills, receipts, invoices, deposit slips and other financial information were kept by the members of the committee. From the scraps of information and bank statements I prepared the committee's reports.

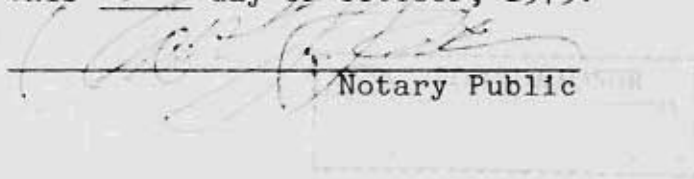
1. I did not employ any formal bookkeeping procedures. I did not keep a tally of JAB's outstanding debts. Others may have kept a tally of its assets.
2. Some of the deposit slips are in my handwriting so I must have made some deposits. I do not believe I ever made or authorized any withdrawals.
3. Some contributor information was forwarded to me for use in preparation of JAB's financial reports.
4. I do not understand question. Financial information came from members of the committee. Some information, such as addresses or occupation of contributors may have come from other sources (e.g. telephone books).

5. Francis J. Ryan, Michael Ryan, D. D. Wozniak, William O. Cooley.
6. No
7. No. I prepared all the Committee Reports at my law office.
8. My office. I believe I asked my sister to contribute at a restaurant.
9. Prior to my deposition in this matter, I didn't know anything about it.
10. Prior to my deposition in this matter I didn't know anything about it.
11. I have no present recollection that JAB ever entered into a business relationship with JFP & Associates. I do remember speaking to Mr. Jen0 Paulucci in early November, before the election.
12. N.A.
13. June, 1979.
14. Not before June, 1979.
15. After the election, I believe I sent Mr. Wozniak copies of the financial reports.
16. Other than any involvement I may have had in sending letters and telegrams to the FEC, I don't believe I gave financial information to anyone. I am sure I reported to a number of people that I had succeeded in raising some money from my brothers and sisters.
17. No
18. I do not know.
19. I do not have any idea.
20. It is not.

21. Apparently because the invoice was not in my file.
Further affiant saith not.


Brian P. Short

Subscribed and sworn to before me
this 5th day of October, 1979.


Notary Public

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date October 1978

Inv. No. **10415**

Your P. O. No. _____

[Short for Senate Committee of Vol.]
1011 Marquette Avenue
Minneapolis, MN 55403
Fred L. Gates, Campaign Manager
[R.J. Foster, Treasurer]

Job No.
3753

Don't Be Misled - (Newspaper Ads)

\$2,691.52

83040411513

JFP & Associates, Inc.
 Advertising & Public Relations
 425 Lake Avenue South
 Duluth, Minn 55802 (218) 727-8836

**PROPOSED MEDIA SCHEDULE
 AND COST ESTIMATE**

Job No. 5753

Date October 19, 1978

CLIENT: PERPICH-OLSON COMMITTEE
 ANDERSON VOLUNTEER COMMITTEE
 SHORT FOR SENATE COMMITTEE OF VOLUNTEERS

PAGE AD: Don't Be Misled

MARKET	MEDIUM	DATES	TOTAL COST
Duluth Sunday News-Tribune		Sun. November 5	\$ 1,769.88
Hibbing Daily Tribune		Fri. November 3	457.52
International Falls Journal		Fri. November 3	361.20
Virginia Mesabi Daily News		Fri. November 3	553.84
Aurora East Range Shopper		Wed. November 1	101.47
Aurora Range Facts/Biwabik Times			
		Fri/Thu November 2/3	255.00
Bovey Scenic Range News		Thu. November 2	89.60
Chisholm Free Press		Thu. November 2	110.30
Chisholm Tribune Press		Tue. October 31	110.30
Duluth Budgeteer		Wed. November 1	805.69
Duluth Labor World		Thu. November 2	225.01
Ely Echo		Wed. November 1	295.84
Ely Miner		Wed. November 1	210.00
Floodwood Forum		Thu. November 2	84.00
Grand Rapids Review		Thu. November 2	255.00
Nashauk Eastern Itasca		Thu. November 2	235.20
Proctor Journal		Thu. November 2	94.50
Tower News		Thu. November 2	105.00
Two Harbors Lake Co. News Chronicle		Wed. November 1	291.77
Eveleth Range Scene		Wed. November 1	181.18
Gilbert Herald		Wed. November 1	181.18
Cloquet Pine Knot		Thu. November 2	500.06
Aitkin Independent Age		Wed. November 1	167.70
Crow Wing County Review/Walker			
Pilot Independent		Thu. November 2	326.30
Moose Lake Star Gazette		Thu. November 2	307.02

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP & Associates, Inc.

Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

PROPOSED MEDIA SCHEDULE AND COST ESTIMATE

Job No. 5753

Date October 19, 1978

CLIENT:

MARKET

MEDIUM

DATES

TOTAL COST

TOTAL COST: \$ 8,074.56

1/3 = \$ 2,691.52

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

J. F. P. & Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

**PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE**

Job No. 5753

Date October 27, 1978

CLIENT: Anderson-Oberstar-Perpich-Short

FULL PAGE AD: Special Interest

MARKET	MEDIUM	DATES	TOTAL COST
Duluth	News Tribune & Herald	Thu.-Nov. 2, 1978	\$1733.76 gr./\$147
Ud.- Hibbing	Tribune	Thu.-Nov. 2, 1978	\$457.52 gr./\$388.
Ud.- Virginia	Mesabi Daily News	Thu.-Nov. 2, 1978	\$553.84 gr./\$470.
Ud.- International Falls	Journal	Thu.-Nov. 2, 1978	\$361.20 gr./\$307.
Ud.- Brainerd	Dispatch	Thu.-Nov. 2, 1978	\$433.44 gr./\$368.
			<u>3559.76</u> <u>3005</u>
			<u>1022.20</u> <u>60</u>
			<u>2945</u>
			<u>884.74</u>
			<u>958.96</u>
			<u>854.94</u>
			<u>958.96</u>
			<u>958.96</u>
			<u>3761.52</u>

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 727-8836

PROPOSED MEDIA SCHEDULE
AND COST ESTIMATE.

Job No. _____

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
GOVERNMENT COMMITTEE

pg. 2

MARKET	MEDIUM	DATES	TOTAL COST
<u>WAKX-AM/FM - Duluth, Minn.</u>			
13 :60 spots		\$ 124.60	
<u>WEBC-AM - Duluth, Minn.</u>			
28 :60 spots		\$ 376.48	
<u>WIIFG-AM - Hibbing, Minn.</u>			
12 :60 spots		\$ 63.53	
TOTAL: \$2,954.01			
DUBS: 50.00			
GRAND TOTAL: \$3,004.01			

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.
Advertising & Public Relations
425 Lake Avenue South
Duluth, Minn 55802 (218) 723-5500

Date November 6, 1978

Inv. No. **10473**

Your P. O. No. _____

[Just A Bunch Of DFL Folks Who Want
Common Sense Government Committee
401 Midwest Federal Building
St. Paul, MN 55101]

Job No.

1239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01

8304041152

J.F.P. & Associates, Inc.
 Advertising & Public Relations
 425 Lake Avenue South
 Duluth, Minn 55802 (218) 727-8836

**PROPOSED MEDIA SCHEDULE
 AND COST ESTIMATE**

Job No. 1239

Date November 6, 1978

CLIENT: PLAIN D.F.L. FOLKS WHO WANT COMMON SENSE
 GOVERNMENT COMMITTEE

MARKET	MEDIUM	DATES	TOTAL COST
<u>KDAL-TV - Duluth, Mn.</u>			
5 :30 spots & 4 :60 spots		\$1,294.00	
<u>WDIO-TV - Duluth, Mn.</u>			
4 :30 spots		\$ 310.00	
<u>KBJR-TV - Duluth, Mn.</u>			
5 :30 spots		\$ 440.00	
<u>WDSM-TV - Duluth, Mn.</u>			
18 :60 spots		\$ 159.00	
<u>KDAL-TV - Duluth, Mn.</u>			
11 :60 spots		\$ 186.50	

Client Approval:

This approval constitutes our authority to J. F. P. & Associates, Inc. to contract for space or time indicated on this Proposed Schedule, subject to any modifications or alterations that may be noted thereon.

Date _____

Signed _____

JFP &
Associates, Inc.

Advertising & Public Relations

425 Lake Avenue South

Duluth, Minn 55802 (218) 723-5500

Date October 1978

Inv. No. **10433**

Your P. O. No. _____

Short For Senate Committee Of Vol.

1011 Marquette Avenue

Minneapolis, MN 55403

Fred Gates, Campaign Manager

R.J. Foster, Treasurer

Job No.

5753

Special Interest - (Newspaper Ad)

\$958.86

8304041152

83040411926

RECEIVED
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

13 OCT 10 PM 1:49

from — O'CONNOR & HANNAN
THIRTY-EIGHTH FLOOR IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

for
Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

200# 10817

Copy to
FEDERAL
C

2260 Summit Avenue
St. Paul, Minnesota 55105

2 August 1979

'79 AUG

11:07

RE: MUR 812

William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

9034.2

Dear Mr. Oldaker:

In your letter of July 25th, you give notice of a report to the Commission in late August on this matter and an opportunity to respond to the Commission's reason to believe finding. I should like to respond by briefly clarifying the reasons why a report was not filed in due time.

In essence, it was not thought necessary, i.e., that the law did not require it at all.

Prior to placing the ad, I sought legal advice on the reporting requirements. The answer to my inquiry was that any expenditure of \$1000 or less need not be reported. Confident that I was within the law, I proceeded to place the ad on October 31st, at a cost of \$685.40 (the amount of \$1686.40 cited on page 14 of the transcript of proceedings for the June 20th deposition is a typographical error).

Having studied now the statutes and regulations which you kindly supplied, it is apparent that the legal opinion I received was based on the definition of "political committee" in 2 U.S.C. § 431 (d):

- (d) "political committee" means any committee, club, association, or other group of persons which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000;

Since this single-time ad was the only expenditure for this "group of persons" during the calendar year 1978, and since it clearly did not, even in an aggregate amount, exceed \$1,000, it was concluded that provision 2 U.S.C. § 434 (a) did not apply:

- (a) (1)each treasurer of a political committee supporting a candidate or candidates for election to Federal office, and each candidate for election to such office, shall file with the Commission reports of receipts and expenditures on forms to be prescribed or approved by it.

This was thought to be inapplicable because the "group of persons" in question did not technically fulfill the descriptive clause of a "political committee" - (any group of persons) "which receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$1,000."

(In fact, this "group of persons" hardly fulfilled the ordinary meaning of "group", since the only communication among them was of the most tenuous kind: my own conversing with each as I solicited their support for the ad by telephone one-by-one.)

33040411327

7/25/79
FEDERAL
C

Since 2 U.S.C. § 434 (a) was considered inapplicable, naturally the second provision, § 434 (b), about contents of reports, was thought likewise. In particular, subsection 13 under § 434 (b) - which treats reporting of an independent expenditure in excess of \$100 by a political committee, other than an authorized committee of a candidate (detailed in 11 CFR § 109.2) - was likewise viewed as not applying to the given situation. For, while the expenditure was clearly in excess of \$100 for the ad, the "group of persons" involved was again understood to fall outside the definition of "political committee" expressly referred to in the subsection.

When one examines the U.S. Code to find some provision to cover this type of situation, the nearest parallel is § 434 (e): Contributions or expenditures by person other than political committee or candidate.

- (1) Every person (other than a political committee or candidate) who makes contributions or independent expenditures expressly advocating the election or defeat of a clearly identified candidate, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 during a calendar year shall file with the Commission, on a form prepared by the Commission, a statement containing the information required of a person who makes a contribution in excess of \$100 to a candidate or political committee and the information required of a candidate or political committee receiving such a contribution.

(substantially repeated in 11 CFR § 109.5)

At the time the ad was placed, it was thought this provision did not strictly apply either, since it referred to an individual person. Therefore no report was made or filed.

Since that time, however, the staff of the Commission, made aware of the ad through its inclusion with a complaint from Paul Overgaard, chairman of the Durenberger for Senate Campaign, has insisted that a report be filed. This Mr. Kevin Powers, whose name appeared on the ad as treasurer to comply with Minnesota statutes, did on May 8, 1979.

I can only presume that the Commission's insistence on a report follows on an interpretation of 2 U.S.C. § 434 (e) (1) // 11 CFR § 109.5 based on the definition of "person" under Part 109.1 (Independent Expenditures) of Commission Regulations:

§ 109.1 Definitions

- (a) "Independent expenditure" means an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate.....
- (b) For purposes of this definition -
 - (1) "Person" means an individual, partnership, committee, association, or any organization or group of persons.....

Under this definition as applied to § 434 (e) (1), it would seem that this particular group of persons would, indeed, be required to file a report.

33040411528

However, while most of the definitions in the Regulations of the Commission correspond to those of the Code, this one does not. In fact, no definition of "person" appears in the Code, leaving, for one who has access only to the Code, no recourse but to infer from § 434 (a) (1) that "every person (other than a political committee or candidate)" means simply a single individual. In fact, it may well have meant precisely that by those who drafted and the Congress which approved the legislation. The fact that no definition at all appears in the Code would warrant this surmise.

With this appearance in Commission Regulations of a broader definition of "person" not corresponding or even considered in the Code, the way was open to confusion at best and conflicting interpretations at worst. None of this analysis accompanied the legal advice I received. However, the terse opinion that a disclosure report was not required for expenditures under \$1,000 has now left me with the distinct impression that the legal research was conducted only with the Code and not with the Regulations. Had the Regulations been consulted and their interpretation conveyed to me, I probably would have filed a report, despite conflicting language, against the possibility of a determination that the Rules do in fact reflect the intent of the Code. As it was, I was left feeling that this expenditure was not sizably significant for the Commission to monitor. Naturally, I was pleased at the prospect of reduced paperwork!

With this clarification, I would hope the Commission can more fully understand how confusion over the terms involved led to a decision not to file a report at the time the ad was placed. It was understood not to be required. If this might seem to be an uninformed decision, I submit that it was not culpable ignorance of the law, but quite evident misinformation which was to blame.

In light of the foregoing explanation, I submit that 1) reasons are insufficient for finding negligence in failing to file a disclosure report with the Commission in due time, and 2) since a disclosure report was in fact eventually filed with the Commission on regulation form Schedule E, the intent of 2 USC § 434 has not been formally violated.

In seeking final determination of this matter by the Commission, I respectfully request that the "complaint" against this ad be dismissed and the case closed.

Yours sincerely,

Leo V. Tibesar

(Rev.) Leo J. Tibesar

cc: Suzanne Callahan
Federal Election Commission

Kevin Towers
735 East County Road B
St. Paul, Minnesota 55117

Paul Overgaard
c/o Senator David Durenberger
353 Russell Office Building
Washington, D.C. 20510

83040411930
L.J. Tibesar
2260 Summit Avenue
St. Paul, MN 55105



'79 AUG 7 PM 1:07

Suzanne Callahan
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR 812

L.J. Tibesar
2260 Summit Avenue
St Paul, MN 55105



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR 812

83040411543

2260 Summit Avenue
St. Paul, Minnesota 55105

30 April 1979

GCCT
10311

Federal Election Commission
c/o Office of Associated Reporters
446 U.S. Courthouse
4th Street and South 2nd Avenue
Minneapolis, Minnesota 55401

Re: MUR 812
Att: Suzanne Callahan

902670

To Whom It May Concern:

Pursuant to section 437d of Title 2, United States Code, I have been subpoenaed by the Federal Election Commission, through the office of Suzanne Callahan, to produce on April 30th:

- a) all correspondence, memoranda, or other documents from or to me under my control which pertain in any way whatever to my activities or other persons activities on behalf of the Senate candidacy of Robert Short.

In compliance therewith, I hereby supply the Commission (see enclosure) with copy for an advertisement on behalf of the Senate candidacy of Robert Short which appeared in The Catholic Bulletin on November 3, 1978.

Also pursuant to the same aforementioned section, I have been subpoenaed to produce:

- b) contemporaneous memoranda, telephone logs, daily calendars, and any other records under my control regarding phone calls to or other oral communication with persons associated with the Senate candidacy of Robert Short in any capacity whatever.

In compliance therewith, I hereby supply the Commission (see enclosure) with a photocopy of Northwestern Bell's detail of long distance calls made from my private phone to some names appearing on the ad - a detail which was part of NW Bell's November 10th bill, a personal check in payment of which is also photocopied.

Also pursuant to the same aforementioned section, I have been subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short on May 9, 1979, at 4:00 pm.

I have made plans to appear.

Sincerely,

Leo J. Tibeser, Jr.

Leo J. Tibeser, Jr.

enclosures (2)

33040111532

WE TRUST BOB SHORT

- * To sponsor a HUMAN LIFE AMENDMENT and oppose public funding for abortion. (MCCL Newsletter, Nov 1978)
- * To resist diluting his advocacy of JUSTICE FOR THE UNBORN, unlike his I-R Opponent, David Durenberger, who ^{appeared to} risked such weakness by hosting GLORIA STEINEM and the DFL Feminist Caucus at his home in 1976. (St Paul Sunday Pionner Press, September 17, 1978)
- * To provide consistent and ~~uncompromising~~ ^{UNCOMPROMISING LEADERSHIP} for the protection of human life, unlike his I-R opponent who is courting the DFL Feminist Caucus. (The Wanderer, October 26, 1978)
- * To raise his voice in the Senate for ALL THE ISSUES THAT RESPECT LIFE and promote justice for the powerless.
- * To avoid costly and dangerous programs for social engineering, unlike his I-R opponent who actively solicited and received endorsement by AMERICANS FOR DEMOCRATIC ACTION. (St Paul Sunday Pionner Press, October 1, 1978)
- * To be a TRUE AND LASTING FRIEND of the unborn, the elderly, the handicapped ethnic minorities, and stable family life.

TRUST SHORT - VOTE FOR LIFE

Carol Wold - Democratic National Committeewoman

Kay Hatfield - Members of the DFL

Jean Meyer

J. Buford Johnson

Bill Eagen

State Executive Committee

and DFL Statewide Pro-Life Delegates and Alternates
etc.

Paid advertisement--at regular advertising rates.
Prepared and authorized by the above named signators
for and on behalf of Bob Short, candidate for the U.S. Senate.
No candidates have authorized this ad.

93040411533

LEO J. TIBESAR, JR.

SSN 468-48-1113

2260 SUMMIT AVENUE 612-698-4092

ST. PAUL, MINN. 55105

2136

22.7
860

PAY TO THE
ORDER OF

NORTHWESTERN BELL

340¹⁸

FORTY

1 6 5 7 1 0 5 0 0 0

18
100 DOLLARS



American Bank

American National Bank and Trust Company
Fifth & Minnesota St. St. Paul, Minn. 55101

AP

MEMO

From Dec 9 (bill by Nov 10)

Leo J. Tibesar, Jr.

⑆0960⑆0007⑆019⑆389⑆6⑆ 2136 41⑆0000004018⑆

To discuss your bill, call your service representative.

The number is 221-6273

PAGE 1

NOV 10, 1978



Northwestern Bell

723 ST PAUL

DETAIL OF LONG DISTANCE CALLS FOR 612 698-4092

DATE	KEY	PLACE CALLED	AREA	NUMBER	MIN	CL	TIME	GROSS	NET
1030	A	GRAND RPDS MN	218	326-2627	1	2	735P	57	37*
1030	A	ST CLOUD MN	612	253-9899	3	2	741P	104	67*
1030	A	HIBBING MN	218	263-5060	1	2	756P	57	37*
1030	A	AURORA MN	218	229-3535	3	2	805P	139	90*
1031	A	GRAND RPDS MN	218	326-2627	3	1	928A	139	139
1031	A	LITTLE FLS MN	612	632-6485	4	1	932A	157	157
1031	A	SULLIVANLK MN	612	277-3876	1	1	936A	49	49
1031	A	SULLIVANLK MN	612	277-3524	5	1	937A	177	177
11 7	A	ABERDEEN SD	605	225-7065	1	1	850A	46	46
11 7	A	WINONA MN	507	454-4381	2	1	1018A	91	91
11 7	A	WINONA MN	507	454-1163	5	1	1020A	205	205
TAX-US		.44	STATE	.42			TOTAL EXCL TAX		1095

*DISCOUNT APPLIED - SEE CALL GUIDE IN YOUR TELEPHONE DIRECTORY

Long distance codes See reverse

83040111534

LJ Tibesar
2260 Summit Av
St Paul, MN 55105

8 3 0 4 0 4 1 1 5 3 5

Federal Election Commission

c/o Office of Associated Reporters

446 U.S. Courthouse

4th Street and South 2nd Avenue

Minneapolis, Minnesota 55401

Re: MUR 812

Att: Suzanne Callahan

63040411530

28

FIRST CLASS

JUN 79

57

ASSOCIATED REPORTERS

Midland Bank Building
MINNEAPOLIS, MINNESOTA 55401

TO

Joyanne Callahan
Federal Election Commissioner
1325 K Street NW
Washington, DC 20443

FIRST CLASS

RECEIVED
FEDERAL ELECTIONS
COMMISSION

600#

10000

APR 30 AM 59

2260 Summit Avenue
St Paul, Minnesota 55105

25 April 1979

Suzanne Callahan
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 812

Dear Ms. Callahan:

This is to certify that there arrived today
from your office a subpoena to appear for
deposition in connection with the Senate
campaign of Robert Short.

The deposition is scheduled for 4:00 pm
on May 9th at the U.S. Courthouse in Minneapolis.
The mileage is accurate.

I shall make plans to appear.

Sincerely,

Leo J. Tibesar, Jr.

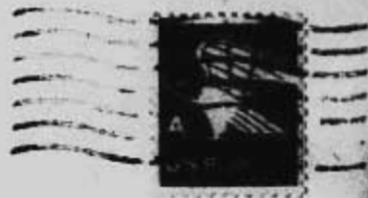
Leo J. Tibesar, Jr.

83040111537

8304041153
Leo J. Tibesar, Jr.
2260 Summit Avenue
St Paul, Minnesota 55105

FEDERAL ELECTION
COMMISSION

19 APR 30 AM 10:38



Suzanne Callahan
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

GEC#
9928

RANDALL E. JOHNSON
ATTORNEY-AT-LAW

SUITE 170, GREEN VALLEY OFFICE CENTER
6100 GREEN VALLEY DRIVE
BLOOMINGTON, MINNESOTA 55438
612/888-1890

GEC#
9928

April 16, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street NW
Washington, DC 20463

Re: Mr. Paul P. Overgaard's Complaint against U.S. Senate candidate
Bob Short, et al.

Dear Bill:

In regard to the above captioned matter which I have previously discussed with you, I believe you will find the enclosed two newspaper clippings interesting. The story entitled, "'Independent' group included Short's children", was in the Minneapolis Tribune on December 15, 1978.

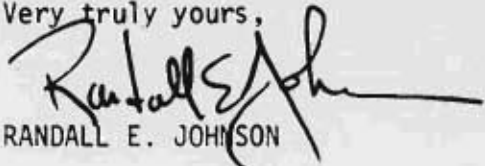
The article entitled, "Election shows law not flawless", was in the Minneapolis Tribune on December 18, 1978.

Please note that this was not a minor technical violation by a small group, but as Mr. Overgaard previously alleged and was confirmed in the newspaper story, the "independent" group included not only Mr. Short's children and wife, but also almost his entire authorized campaign committee! In this regard you will want to confirm that the "independent" radio commercials were taped at WWTC--a station owned by Mr. Short.

This seems to be an open-and-shut case, and the only reason I can understand for further delay might be the Commission's reluctance to refer a knowing and willful violation to the Attorney General for prosecution under 2 U.S.C. Section 441 j.

Please let me know if Mr. Overgaard can be of any assistance to the Commission in its investigation and prosecution of this egregious violation.

Very truly yours,


RANDALL E. JOHNSON

REJ:mlm
Enclosures

8 3 0 4 0 4 1 0
RANDALL E. JOHNSON

ATTORNEY-AT-LAW

SUITE 170, GREEN VALLEY OFC. CTR.
6100 GREEN VALLEY DRIVE
BLOOMINGTON, MN 55438



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street NW
Washington, DC 20463

Years ago Sadat made long statements to reporters after the meeting in Cairo.

Meanwhile, Israeli radio quoted Agriculture Minister Ariel Sharon as saying yesterday that Israel will be-

Edison continued on page 6A

Leah Delia let it slip out that he doesn't plan to run for reelection next year. It was the first time he has said that publicly although some of his campaign workers have been looking for someone to run in his place.

The eight Democrats on the council

weeks and at it finally erupted yesterday after they had lagged for nearly three hours on two controversial items. Among the highlights:

• Walter Dardar stepped to his feet, flailed the air with his arms and belittled at Judy Corbin. "You're lying! You were out there talking to

to be discussing an earlier round meeting. Don't lie to me! I know where the mayor was that day. That's what's wrong with the council."

• Corbin admitted that she had been a "very bad father" as council leader and that she has been so far

'Independent' group included Short's

By Steven Darnfeld
Staff Writer

If Bob Short had been curious about who was involved in the "independent" group that promoted his U.S. Senate candidacy, the secret is now out — it was some of his children and political advisers.

The group, Just a Bunch of Plain DFL Folks Who Want Common Sense Government, filed a report Thursday declaring that it had raised and spent a little more than \$20,000 in the final two weeks of the campaign on Short's behalf.

Among the plain folks listed as contributors

• Brian, Mariamne and Kevin Short, three of the candidate's children. They gave \$2,000. Brian and Mariamne are lawyers and Kevin is a law clerk for U.S. District Judge Miles Lord. All three were involved in Short's campaign.

• William Cooley, former aide to Minneapolis Mayor Albert Sabatini, and W. Morgan Fleming, a lobbyist, both of whom were involved in Short's campaign. Cooley, his wife, Helen, and Fleming gave \$1,000 apiece.

• State Rep. James Rice, a Minneapolis consultant who was paid \$1,300 by Short's principal campaign committee. Rice, his wife, Jill, and five

children, ranging in age from 19 to 27, gave \$1,000 to the Just a Bunch committee.

• Former state Rep. D. D. Womack, St. Paul, who was one of Short's closest advisers. Womack gave the Just a Bunch committee \$1,000 and his wife, Angela, gave another \$1,000.

• Mrs. Oscar (Gertrude) Matson, Minneapolis, wife of Short's longtime publicist and business associate. She gave \$300.

The Just a Bunch committee surfaced late in the campaign, and paid for a series of newspaper and radio advertisements naming Indepen-

dent-Bunch-Thurs David Darnfeld and others (DPLA) who decided to back Darnfeld over Short.

Despite the advertising barrage, Short lost to Darnfeld by a margin of nearly 2 to 1.

Short, a Minneapolis hotel and trucking executive, said yesterday that he did not know who had contributed to the Just a Bunch committee "until a few days ago."

He said that if he had known his children were going to be approached for contributions, he "would have advised them not to." The reason, he said, is that their contributions are certain to prompt

Iran violence continues as shah seeks coalition

William Stone Services

Tehran, Iran
Violent demonstrations erupted in a dozen cities Thursday as Shah Mohammad Reza Pahlavi, in another effort to end the bloodshed, tried to persuade opposition leaders to join a coalition government.

Several dozen injuries were reported in the clashes between supporters and opponents of the shah. Allegations by the opposition that as many as 20 people had been killed could not be confirmed.

Meanwhile, government forces acknowledged that three men dressed in military uniforms had opened fire yesterday with automatic weapons at

Ex-convict denies guilt in murder of wife to grave — and beyond

By Peg Meier
Staff Writer

Jo Hylck wanted the last word. He died of cancer Sunday but still is taunting the people of Duluth, people he has never forgiven.

Hylck was charged with murdering his wife in 1955. He pleaded not guilty and swore he saw a "mysterious stranger" at their house the night she was bludgeoned to death. A jury found him guilty of second-degree murder.

A prosperous insurance salesman who lived in a fashionable part of Duluth, he was sentenced to 40 years in Stillwater Prison. He was paroled six years ago. Then, after being remarried, moved to Wisconsin, worked as a salesman for AAA and moved about the state and the



Jo Hylck

Hylck in Stillwater Prison and he figured Hylck wanted one last chance to defend himself. They let him in.

Yesterday morning a plane flew over Duluth and dropped his remains. The report is the narrowest one that the drop hit the coast house. If so, it's sure to be the people who work at the courthouse and other government buildings near by. "Didn't believe a thing," said a clerk's deputy. "Didn't hear anything about it either."

Hylck had anticipated that his falling remains might go unnoticed. He well understood how easy to place advertisements in Duluth newspapers for a week after the plane was crashed to tell people the terms of the will and to let them know Jo Hylck is back in

for the

covered. President let it slip out that he run for reelection on the first time he ability although some workers have been made to run in his

crises on the control

have been leading openly in recent weeks and at it finally erupted yesterday after they had bugged for nearly three hours on two radioverbal items. Among the highlights

Water Boarder leaped to his feet. Batted the air with his arms and belittled at Judy Curran. "You're lying! You were out down talking to

the mayor (when she was supposed to be convening an earlier caucus meeting). Don't be so sure I know where the mayor was that day. That's what's wrong with this caucus."

Curran admitted that she had been a "very bad failure" as caucus leader and that she has been so con-

fellow Democrats on various issues.

Raisville, who complained about the "backbiting" within the caucus, took a nip at Mark Kaplan for holding a joint press conference with two Republicans to explain his position on a recent caucus vote. Raisville said she was "appalled" to see Kaplan with the Republicans.

Democrats and North Side Democrats is alive and well. And growing.

Everyone agreed that the Republicans are taking advantage of the DFLers' disarray, which could be fatal for some Democrats come election time. The Republicans have perked Kaplan and Curran as special

Caucus continued on page 4A

' group included Short's children

and Steve Short, anti-state's children. On Brian and Steve and Steve is a late District Judge Miller were involved in a

ry. Former wife to your Albin Substant, Fleming, a lobbyist, were involved in a. Condy, his wife, wrong gave \$2,000

nes Short, a Minnapo was paid \$2,200 and campaign costs wife, Bill, and five

children, ranging in age from 19 to 22, gave \$2,000 to the Just a Bunch committee.

Former state Rep. D. D. Wamash, St. Paul, who was one of Short's closest advisers, Wamash gave the Just a Bunch committee \$2,000 and his wife, Angela, gave another \$2,000.

Ellen, Short's (Conservative Movement, Minneapolis, wife of Short's longtime publicist and business associate. She gave \$200.

The Just a Bunch committee announced that in the campaign, and paid for a series of newspaper and radio advertisements naming Indepen-

dent-Republican David Durenberger and liberal DFLers who decided to back Durenberger over Short.

Despite the advertising barrage, Short lost to Durenberger by a margin of nearly 2 to 1.

Short, a Minneapolis hotel and trucking executive, said yesterday that he did not know who had contributed to the Just a Bunch committee "until a few days ago."

He said that if he had known his children were going to be approached for contributions, he "would have advised them not to." The reason, he said, is that their contributions are certain to prompt

questions about how "independent" the Just a Bunch committee really was.

Even before the filing of yesterday's report, the Durenberger campaign and Minnesota for Memory in Politics, a liberal DFL group, had filed formal complaints with the Federal Elections Committee charging that the Just a Bunch committee was "a front" for the Short campaign.

U.S. Rep. Bill Frenzel, an Independent-Republican from Minnesota who helped write the federal election law, said yesterday that the contents of the report from the Just

Short continued on page 6A

convict denies guilt in murder rife to grave — and beyond

anted the last word later Sunday but still to people of Duluth, corner Sargent.

tinged with murder in 1976. He pleaded to state he was a "stranger" at that time. He was found guilty. A jury found the co-defendant murder.

convicted defendant a formidable part of the sentenced to 99 years Prison. He was now age 34. He had a record. He moved to Duluth. He was now a member of A.A.A. but he



Hyatt in Stillwater Prison said he feared Hyatt wanted one last chance to retract his statements they had made in

Yesterday morning a plane flew over Duluth and dropped two bombs. The report to the survivors was that the drop hit the court house. If so, it's news to the people who work at the courthouse and other government buildings near by. "Didn't notice a thing," said a sheriff's deputy. "Didn't hear anything about it either."

Hyatt had anticipated that his falling remains might go unnoted. He was disappointed to find survivors to place advertisements in Duluth newspapers for a week after the plane was scattered to tell people the terms of the will and in

Vietnamese visits Japan

Vietnamese Foreign Minister Nguyen Day Trinh arrived in Tokyo on Thursday for a six-day visit that probably will focus on Japanese aid. Japan reportedly will extend more than \$200 million to finance a power plant in Hanoi.



Friday, Dec. 15, 1978
34th day, 16 to go this year
Sunrise: 7:44. Sunset: 4:32

Today's weather Colder Saturday

Partly cloudy skies and mild temperatures is today's forecast for the Twin Cities and vicinity. The predicted high temperature is in the upper 20s, the low tonight 15 to 20 and the high Saturday is in the upper 20s.

Details on Page 11B

U.S. moves to help more people get mortgages

Associated Press

Washington, D.C.

As many as 25 million families may be able to buy homes because of government action Thursday allowing savings and loan institutions to offer mortgages with lower payments in their early years.

"We are very excited and pleased," said Robert McKinney, chairman of the Federal Home Loan Bank Board. The board approved three types of mortgages that savings and loan institutions will be allowed to offer Jan. 1. It was not known how many institutions would do so.

The nation's 2,012 federally chartered savings and loan associations are covered by the rule. There are 2,034 institutions with state charters not covered, but many can offer similar mortgages under state regulations.

The board vote allows use of graduated payment, variable rate and reverse annuity mortgages.

McKinney said the graduated payment mortgages would appeal to young families whose incomes are likely to rise. He estimated that 25 million families who otherwise would be priced out of the market would be able to buy homes under the new mortgage plans.

The graduated payment system starts with lower payments than a normal mortgage, increasing over the first five years on the assumption that the family's income will increase.

E
C

1
5



between 7th and 8th Sts. In center photo, members of the Figure Skating Club performed. At right, Bobby Bonnelly, who also is in the movie, watched the activities.

Proceeds from the performance were scheduled to go to the U.S. Figure Skating Association, the Twin Cities Skating Club and the Amateur Hockey Association of the United States.

carefully being sur-
- that come up before
- it also would prevent
- etimes getting these
- tations

the Republicans are
- and well-prepared at
- ng. Rocky's got a
- 1, and he's got those
- ring to his, his
- atever

referring to the other
- man, Charles West,
- nd Mayor Trane?

in front of the single
- mean, contribute. It
- was her idea to air the
- today. She asked for
- the agenda.

he discussion quite
- for more cooperation
- the lack of discipline
- p. As an example, the
- row's prohibition for
- being chairs meet
- defended herself,
- e shouting outburst

worked the delays in
- ing, saying, "These

for the medical com-
- ward said last night
- charbed the child's
- ad not decided what
- in the hospital

other, I wrote Hyatt of
- S. man at work at the
- school, according to

couple of false alarm-
- was found with re-
- a was in a parking lot
- ad downtown. Police
- could have been easy
- 1976 Ford, black and
- r, with a noisy muffler
- treatment on the hood

is was dressed in a

things happen."

But Dilliers retorted, "But they are
happening all the time. If you don't
want to admit there's a problem
there, fine."

Dilliers has been the peacemaker
on the council, but he has said re-
peatedly over the last few months
that he was tired of that role and
tired of educating new aldermen
about their roles.

Imedjar has been bristling for three
weeks since the Republicans said he
and Alderman Patrick Dougherty
each have an understaffed staff
and

Kaplan and Slater voted with the
Republicans and independent Ben-
jamin Schulteis to send the question
back to committee for review. Dill-
ier and Dougherty considered that a
slap in the face and were embar-
rased by the lack of DFL unity.

Usually, the lines of personal com-
munication are developed and lead-
ership roles are established within
six months or so after a new council
takes office, but that hasn't hap-
pened with this group.

The feudling within the DFL caucus
has been going on since January,
when this council with its seven new
members took office.

Short Continued from page 1A

a Busch committee strongly suggest
that it "was not very independent" of
the Short campaign committee.

Frenzel said the idea behind allow-
ing "independent committees" was
to permit people with strong views
about the merits of candidates to buy
advertising and voice those views.

"But we were very careful in the law
to require that independent commit-
tees be independent and not be
linked to the candidate's principal
committee in any way," he said.

Short's principal campaign commit-
tee and the Just a Busch committee
appear to have numerous links.

Wozniak, chairman of the Just a
Busch committee, was one of Short's
key advisers, both men said yester-
day. Wozniak said he formed the
Just a Busch committee when
Short's principal committee refused
to implement some of his ideas on
ways to attack Durenberger.

In addition, materials for some of
the ads run by the Just a Busch
committee was provided by Brian
Short and Rice, both of whom were
deeply involved in Short's principal
committee.

Cooley and Fleming, fund-raisers for

the Short committee, made contribu-
tions to the Just a Busch committee
and may have provided other as-
sistance. Cooley once told a reporter he
helped create the ads for the Just a
Busch committee.

Two years ago the Federal Elections
Commission received a complaint
about similar ties between the prin-
cipal campaign committee of Presi-
dent Ford and a "independent" com-
mittee that had been established to
work in his behalf.

The complaint involved a Michigan
man who had raised funds for Ford.
The man had formally withdrawn
from the Ford committee and orga-
nized a group called Friends of the
First Family. That group raised and
spent \$19,800 in Ford's behalf.

The commission ultimately ruled
that the group was not truly indepen-
dent because its organizer had con-
tinued to have "contacts of a cam-
paign nature" with the Ford com-
mittee even after he had formed
Friends of the First Family.



A gift of luxury and fashion: the hooded full-length robe

Add fashion to his leisure hours...
give him this magnificent robe. It's
hooded, with big, practical pockets
and full, comfortable dolman
sleeves. In blue and rust, with
striking contrasting stripes
on each sleeve, braided trim.

50%

Election shows law not flawless

By Steven Dornfeld
Staff Writer

Backers of U.S. Senate candidate Bob Short had difficulty convincing Minnesotans that his opponent, Dave Durenberger, had serious flaws. But they did manage to dramatize some apparent flaws in the federal elections law.

Short backers took advantage of provisions in the law to form two independent committees that bought advertising to promote Diller Short and assail Independent Republican Durenberger.

Both committees spent more than 100 days of the campaign, delayed frustrating with the Federal Election Commission (FEC) until the day before the general election and did not file their final disclosure of political contributions.

As a result, Minnesota voters were denied information similar to that required of all political committees — the names of committees, chairmen and treasurers, where their money was coming from and how it was being spent.

The technique was employed more successfully in the primary against U.S. Rep. Donald Fraser, the DFL endorsed candidate. Four pro-Short committees ran advertisements against him.

One of these committees, the Council on East Range Conservation, says it never did register with the FEC or file any of the required financial disclosure reports, according to the commission.

The freedom accorded to such committees is the result of a 1976 decision by the U.S. Supreme Court. It said Congress cannot prevent indi-

Staff Photos by Bruce Basing



Snc
in lir
at /

Snowmobile Minn. Sunde
Dayco Holds
snowmobiler
heel race as
Heitzhaus of
learned far on
second turn
Hank Hughes
warm with a
For details c
today's spo

Funds continued on page 38

Two who lost House elections make bid for state Senate

68

Minneapolis Tribune
Mon., Dec. 15, 1970

Funds

Continued from page 1B

vehicle and groups from spending money — independent of a candidate — to promote the candidate's election or defeat.

Since then, Congress and the FEC have tried to write laws and regulations to ensure that such committees are truly independent.

For example, FEC regulations say the ads placed by independent committees cannot be written "with the cooperation of, or with the prior consent of, or in consultation with, or at the suggestion of" the candidate, his committee or his agents.

Durenberger's campaign and Minnesota for Seniors in Politics, a liberal DFL group, have filed complaints alleging that one of the independent committees promoting Short did not meet this test. The target of their complaints is Just a Bunch of Plain DFL Folks Who Want Common Sense Government.

Eleven days before the Nov. 7 general election, the Just a Bunch committee began running newspaper ads and radio commercials lodging all sorts of charges against Durenberger and his backers, and urging the election of Short. The group spent a total of \$30,172, according to a disclosure report it filed last week.

The group was headed by former state Rep. D.D. Womack, a St. Paul lawyer who admittedly was one of Short's closest political advisers. One of its vice chairmen was state Rep. James Rice, DFL-Minneapolis, who was a paid consultant of the Short campaign committee.

Rice said last week that he helped create advertisements for the Short campaign committee and the Just a Bunch committee. Womack had said previously that he passed information for another of the ads from Short's son, Brian, who was deeply involved in the Short campaign.

Brian Short, a lawyer, said he was aware of the FEC regulation and was convinced there had been no violation of it. He said he had given money to the Just a Bunch committee because "all of us had a lot of problems with the way the principal campaign committee was being run." But he said he thinks those who say he was "creatively involved" in the other committees "are giving me a lot more credit than I'm due."

"I don't think I've written a complete paragraph in my life," Brian Short said.

The Durenberger campaign also

Take a little Christmas

For memories
of Christmas
morning

POLAROID ONE STEP
INSTANT CAMERA
DOES EVERYTHING
BUT POINT AND
PUSH THE BUTTON
Features automatic
shutter speed and
variable aperture, full
exposure capability
No focusing needed.



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8

"I don't think I've written a complete paragraph in my life," Brian Short said.

The Durenberger campaign also filed a complaint against Employees of Bob Short Campaign, another of the "independent" committees backing Short. One reason for skepticism about the independence of this group was that its co-chairman was Oscar Melismat, Short's longtime political and business associate.

Melismat monitored a number of political meetings for Short and was reimbursed for expenses on several occasions, according to the FEC reports filed by Short's committee.

Groups with the intention of spending at least \$1,000 in a federal campaign are required to register with the FEC no later than 10 days after they organize.

Since the Just a Bunch committee and the Employees committee surfaced late in the campaign, their registrations were not due until shortly before the election. Their first comprehensive disclosure reports were not due until 30 days after the election.

The Just a Bunch committee was a week late in filing its disclosure report and the Employees committee has yet to do so, according to the FEC.

The report from the Just a Bunch committee disclosed contributions from Wosinski, Rice, two of Short's fund-raisers and three of Short's children, raising further questions about how "independent" the committee really was.

Late in the primary campaign, Short had help from four "independent" committees -- the Vermilion East Range Conservation Council, the Democratic Committee of 1,000, the Concerned Citizens of Cook County and Democrats, Republicans and Independents United for a Pro-Life Senate.

The Vermilion group has yet to register or file any reports with the FEC, even though it spent at least \$2,500 on political ads with two Iron Range newspapers. Robert Daggit of Tower, Illinois, its president, could not be reached for comment last week.

Democrats, Republicans and Independents United for a Pro-Life Senate registered on Sept. 12, the day of the primary. A month later it filed a report indicating that all but \$35 of its \$40,000 in contributions had come from the Short campaign committee.

In response to questions prompted by that report, committee leaders and Short backers said the Pro-Life group never had claimed to be independent of the Short campaign.

However, Minnesota's DFL Feminist Caucus was not satisfied with this explanation and it filed a formal complaint with the FEC.

Features include: shutter speed and variable aperture, full accessory capability. No focusing needed. Uses Polaroid SX-70 film; no batteries required. \$8.95.



POLAVISION
INSTANT MOVIE
CAMERA GIVES YOU
THE THRILL OF SEEING
YOUR MOVIES
IMMEDIATELY AFTER
TAKING THEM. Lightweight
pistol grip camera with free
focus 2.0cm lens and low-hi
indicator \$89.99.
POLAVISION PLAYER (not
shown) \$49.99; 2 1/2-minute
phototape cassette \$9.95 e

THE DALES AND BURNEVILLE OPEN EVERY
WEEK TELL 11 P.M. Shop Downtown Minneapolis
9:30 a.m. to 9 p.m. Monday through Saturday
4:30 p.m. Sunday. The Oaks and Burnsville open
11 p.m. Monday through Saturday. 10 a.m. to 5

300#
9936

FOSTER, JENSEN & SHORT

ATTORNEYS AT LAW

828 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401

RECEIVED
FEDERAL ELECTION
COMMISSION

AREA CODE 612
TELEPHONE 332-0337

ROBERT J. FOSTER
THOMAS H. JENSEN
BRIAN P. SHORT

78 APR 20 PM 1:53

April 20, 1979

Thomas J. Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: MUR812

Dear Mr. Whitehead:

Enclosed for your records please find a Xerox copy of the newspaper advertisement run by the Employees of Bob Short Companies in the Minneapolis paper on October 30, 1978. As you will recall, this ad was introduced as an exhibit at Mr. Molomot's deposition in Minneapolis.

Very truly yours,

FOSTER, JENSEN & SHORT

Thomas H. Jensen

Thomas H. Jensen

THJ/lk
Enclosure

902116

33040411517

BOB SHORT

Knows about this Ad...He advised against it. BUT

We Employees of BOB SHORT Companies believe you should Know what we think of him.

We employees of Bob Short companies—most of us members of teamster and hotel unions—view Bob Short with admiration and respect. Many of us have been with him from the day he got into the trucking business 28 years ago and in the hotel business 13 years ago. He is a good employer.

We admire the courage he displayed in joining a very small trucking company, struggling to meet the payroll, and building the carrier as a major freight line between the Twin Cities and Chicago. We watched and worked with him as he displayed the fortitude in the recession of the late 50's to stick with his struggling truck line and instead of selling out, as did his partner in the company, he purchased the largest privately owned regional carrier here. That's when it became Admiral-Merchants Motor Freight Lines, Inc.

We saw how he innovated new freight and hotel service, new customer relations, dealt with every problem of the operations, and worked more as an employee of the company than as the boss. He was one of us.

We take pride in the role that Bob Short has played in the affairs of our community by serving on countless committees, and we knew

that when he joined others in sports activities, ultimately he would be successful.

We are proud to be associated with Bob Short, the successful businessman. He is alert, totally unafraid to risk his name and fortune when he believes he is right. He is a decent man.

The door to his office has always been open to us, and we viewed amazingly the interest he took in us personally and in our families.

Bob Short is that rare employer, who works harder at his job than any one of his employees, views them as his associates, and is not afraid to ask their opinion and advice. He has that rare quality of looking "down the road." No tunnel-vision for Bob Short.

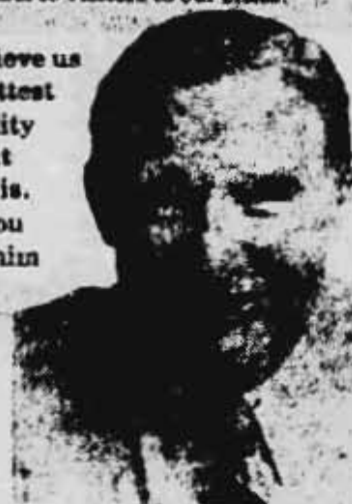
He has aided individuals of our companies when they have been in trouble. He has defrayed hospital and medical expenses when they could not do so themselves, and he has made certain that union employees qualified for union pension.

Bob Short has demonstrated that he is able to cope with the most difficult decisions that require LEADERSHIP—that rare quality that we see only in some men and women.

We know Bob Short to be compassionate, honest, fearless in his convictions, and above all else a workaholic to that end. We distinctly remember his advice to those who questioned the future of his companies and their many problems. He said, "Don't worry about it... Do something about it." He did... We hope we did.

Today, Admiral Merchants Motor Freight is successful. His Leamington Hotels are a credit to the Twin Cities and the hospitality they deliver as hosts to visitors to our city.

Please believe us when we attest to the quality of man that Bob Short is. We hope you will elect him to the United States Senate.



Ann Knapp, 11 P. Traun, Oscar Molomot, Co-Chairpersons, This advertisement has not been authorized directly or indirectly by Bob Short or the Short for Senate Volunteer Committee. A copy of our report will be filed with the appropriate Federal Election Commission and is available for purchase from the Federal Elections Commission, Washington, D.C.

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FOSTER, JENSEN & SHORT
ATTORNEYS AT LAW
525 MIDLAND BANK BUILDING
401 SECOND AVE. SOUTH
MINNEAPOLIS, MINNESOTA 55401



79 APR 23 PM 1:53
Thomas J. Whitehead, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

(612) 341-3800

TELEX 29-0584

TELECOPIER 612 341-3800 (256)

PASEO DE LA CASTELLANA, 6
MADRID 1, SPAIN
(91) 276-5524
TELEX 22350 ORVAM E

DAVID BURLINGAME
MARTIN M. BERLINER
SUITE 560, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 573-7737

April 16, 1979

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. McGUIRE
RICHARD L. POST
KENNETH B. JONES, JR.
ROBERT J. CHRISTIANSON, JR.
CHARLES B. FAEGRE
FRANK J. WALZ
JAMES R. DORSEY
ANDREW J. SHEA
DOUGLAS M. McMILLAN
CHARLES D. REITE
WILLIAM R. McGRANN
WALTER C. PARRINS
MICHAEL M. WHALEN
KENT E. RICHEY
JOHN J. SOMMERVILLE
JAMES A. RUBENSTEIN
NANCY F. FOWLER
CHARLES T. NIXON
JEREMIAH J. KEARNEY
THOMAS R. SHERAN
JOHN A. BURTON, JR.
ROBERT A. BRUNIO

WILLIAM C. KELLY (1916-1970)

LOCAL COUNSEL
F. JAVIER FABREGAT

RECEIVED
FEDERAL ELECTION
COMMISSION

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

79 APR 16 AM 11:58

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH F. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
DAVID R. MELNICOFF
DELANCEY W. DAVIS
RICHARD G. MORGAN
PHILIP R. HOCHBERG
THOMAS V. VARENIC
DOUGLAS M. CARNIVAL
TERENCE R. BOTLE
HORE S. FOSTER
BRIAN P. PHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. CONLON
DONALD S. ARBOUR
LAWRENCE A. JONES
PETER C. KISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON R. GATYER

RALPH F. BERLOW (1923-1972)

OF COUNSEL
JOSEPH F. CASTIELLO
FRED D. THOMPSON
JOHN H. HOLLOMAN

NOT MEMBER OF MINNESOTA BAR

Mr. Thomas J. Whitehead
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 812

Dear Mr. Whitehead:

Confirming our telephone conversation on Thursday of last week, I have located and reviewed the records of the Democrats, Republicans and Independents United for a Pro-Life Senate. The file is available for your inspection, upon telephone notice.

Yours very truly,

Frank J. Walz

FJW:emw

902057

83040411531

O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402



ALWAYS USE
ZIP CODE

79 APR 19 PM 11:58

FEDERAL ELECTION COMMISSION

Mr. Thomas J. Whitehead
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

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9722

79 MAR 1 12

60
901754

March 23, 1979

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr Oldaker

Re: MUR 812

I am responding to an inquiry sent to Mr Robert Earl Short, by the Federal Election Commission. That letter sent to Mr Short was dated March 9, 1979, but never received by him.

Mr Short has been out of the state for a considerable period of time and during his absence, his mail is held at the post office.

A call from your offices indicated to Mr Short's secretary, that no response had been received to the March 9, 1979 inquiry by the FEC. Thus, the copy of the letter to Mr Short was sent to his secretary and received in her office on March 22, 1979, by Federal Express Courier.

That letter to Mr Short asks questions related to an original letter sent to Sharon Jensen on February 7, 1979.

As Mr Short's Campaign Manager, and the person most familiar with the activities of the Short for Senate Committee of Volunteers, I, Fred L Gates, will respond to the 12 questions which you have presented.

Prior to responding to those questions, let me once again assure the Federal Election Commission that the Short for Senate Committee of Volunteers operated completely and fully within the laws, regulations and opinions of the Federal Election Commission and the Federal Election Campaign Act of 1971, as amended.

79 MAR 26 P 3:44

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

William C Oldaker
March 23, 1979
Page Two

You have on file with the FEC all of our reports from the "Statement of Organization" as well as all of our "Reports of Receipts and Expenditures". All of these reports have been filed in a timely fashion and a review of all of them will confirm our compliance with the law.

Additionally, this committee has responded to each and every inquiry made by the FEC in your present investigation which has resulted from a complaint filed by the opponent's campaign manager. It should be clear to the Commission that the original complaint, filed by the campaign manager of our opponent is politically motivated, rather than motivated out of a desire to assure compliance with the Federal Election Commission. For, there is no question but that our committee operated completely and fully within the spirit and letter of the law.

I want you to know that I am most willing, at any time, to visit with the Federal Election Commission in an informal session to answer whatever questions that may remain in your minds regarding this entire matter. However, I am certain that a review of our files and reports which we have submitted, as well as a review of the responses to various questions that you have submitted to us will assure you that our committee acted fully within the guidelines of the law and the Federal Election Commission rulings.

Below are the answers to the 12 questions which you have posed of the Short for Senate Committee of Volunteers:

1. My position with the Short for Senate Committee of Volunteers was that of Campaign Manager.
2. As Campaign Manager, I was responsible for the overall operation of the Short for Senate Committee of Volunteers. That responsibility included every aspect of a campaign, from fund-raising, schedule of events, and authorizing of expenditures to hiring of employees and approving campaign strategy. In other words, every aspect of a campaign was a part of my duties.
3. I am going to break this list into several sections as follows:
 - (A) Paid committee staff; (B) Paid consultants; (C) Volunteers.
 - (A). The individuals named below were paid staff members who served on the committee during the campaign. Every name would not necessarily have been an employee during the entire period of the campaign, as some came for toward the end of the General Election, some were there for only part of the Primary, etc.

Fred L Gates
James Schwinn
John C McHarg
Ramona Nylan
Mark A Skubic
James R Davey
Susan D Hall
William W Conley

Mary J Levitt
Janet A Olsen
Edmond K Sherrill
Byron T Jones
Linda K Leadholm
Nancy Kost
Thomas J Harens
Gina Kiser

Robin Hartney
Michael P Hickey
Charles Dibble
Lester Hall
Alan T Ballavance
Claire F Cleary
Hartrell A Brock, Jr.

- (B) The following received pay as part-time consultants to the committee.

D J Leary
Michael Rowan
Joseph Napolitan
James Rice
Carol Wold
Robert Kinsman
Jim Lukaviewski

- (C) There were many volunteers on the campaign, and it would be very time consuming to list them all within the context of this letter. I therefore have attached appendix "a", which lists most of the volunteers for the committee. The volunteer list attached as appendix "a" is to my knowledge as inclusive as is possible, but it is very likely that there are some names which have been omitted through oversight and/or typographical error.

4. Unlike most campaigns, for a United States Senate seat, our campaign was not as involved in fund-raising activities as most normally would be. The reason for that, as is most clear from a review of our Federal Election Commission filings is that the major source of funds for the campaign came directly from the candidate. We did, however, raise about \$250,000 from the outside. The ultimate authority and responsibility for fund-raising rested with me, Fred L Gates, as the Campaign Manager. I did, however, have a number of people whom I asked to serve as volunteers in assisting in most of the fund-raising activities as such. The names of those people are as follows:

Mr Harold G Soderberg; Mrs Marlys Soderberg; Morgan Fleming;
and Frank Ryan.

5. The individuals listed in #4 were authorized to receive funds on behalf of the committee. All funds received, however, did go through the Campaign Manager, prior to being deposited, and thereby were not authorized until they were actually deposited.

5. (continued)

Authority to expend funds rested with the Campaign Manager, who had to approve each and every voucher for payment. The actual signing of the check authorizing payment required two signatures from a list of three names. Those names were: Fred L Gates, Brian P Short, and Robert Foster.

6. Any person who was not on the committee payroll, and who expended funds legitimately on behalf of the committee or events related to the committee or candidate was reimbursed, provided they would submit a reimbursement voucher alongwith detailed receipt of expenditures to the Campaign Manager. The Campaign Manager had the authority to approve or reject these reimbursement vouchers submitted by these people.
7. The final decision regarding campaign strategy was ultimately approved by the Campaign Manager, myself, Fred L Gates. Actually, as in any campaign, many people would have different suggestions and ideas for campaign strategy. Sometimes the proposal would be written up by an individual and submitted directly to the Campaign Manager, other times, a group of individuals would sit down and discuss campaign strategy and present their findings to the Campaign Manager. The ultimate decision, however, rested with the Campaign Manager to approve any and all campaign strategy for the committee.
8. The committee did indeed have three separate offices during the campaign period. These offices were located in Minneapolis (this was the main campaign headquarters), in St Paul and in Duluth. As I had indicated in the previous question, the campaign strategy was formulated by a number of people and finalized by the Campaign Manager. This question that you presently ask seems to indicate that you are confused between campaign strategy being made by personnel or being made by an office. The office does not make the strategy, the personnel does.
- The Minneapolis office, was main headquarters and housed all of the major personnel for the campaign. The other two offices, one in Duluth and one in St Paul, were only temporary offices which were run mainly by volunteer help. Any and all activities which took place in those offices were always cleared through the main headquarters in Minneapolis.
9. Listed below are the names of the individuals which you have listed in your question, and their involvement with the Short for Senate Committee of Volunteers:

John Angel

Mr Angel was not involved with the Short for Senate Committee of Volunteers. John Angel was, however, the Treasurer of the Committee known as the Democrats, Republicans and Independnts United for a Pro-Life Senate. That committee

9. (continued)

John Angel (cont.)

was a committee "affiliated" with the Short for Senate Committee of Volunteers, and its Statement of Organization clearly reports that.

Kristine Kremer

Kristine Kremer did serve early in the campaign as a volunteer for the Short for Senate Committee of Volunteers, mainly in and around the Thief River Falls area. Subsequently Kristine Kremer became chairman of the affiliated committee known as the Democrats, Republicans and Independents United for a Pro-Life Senate.

Robert Foster

Robert Foster's position with the Short for Senate Committee of Volunteers was that of Treasurer. Besides serving as Treasurer for the committee (an unpaid position), Mr Foster also did volunteer work.

Oscar Molomot

Mr Molomot did some volunteer work for the campaign committee.

Ann Knapp

Ann Knapp had no connection with the Short for Senate Committee of Volunteers.

H.P.Traun

Mr Traun volunteered once or twice as a phone caller for the Short for Senate Committee of Volunteers.

Larry Weisgram

Mr Weisgram had no connection with the Short for Senate Committee of Volunteers.

D. Wozniak

Mr Wozniak had no official connection with the Short for Senate Committee of Volunteers. Wozniak is known to me, and did call me on several occasions to offer advice - advice which generally was not acceptable.

Walter Riordan

Mr Riordan is unknown to the campaign cmte.

Karl Rolvaag

Karl Rolvaag had no official capacity with the Short for Senate Committee of Volunteers. As a politically astute individual, I did seek out Mr Rolvaag's opinions on any number of items which would come up from time to time with regard to campaign strategy.

Peter Popovich

Mr Popovich did do some volunteer work for the committee.

9. (continued)
James Rice

Mr Rice did volunteer work for the committee and also was hired as a consultant to assist in putting together veterans to support the candidate.

Kevin Powers

Mr Powers is unknown to the campaign committee.

10. The following is a list of records and documentation which have been retained by the Short for Senate Committee of Volunteers:

All financial records from both the Primary and General Elections. These records are complete in accordance with the Federal Election Commission regulations which require the safe-keeping of such records after an election.

Newspaper Ads.

News Digests.

County Fairs.

State Fairs.

Plant Gate Information.

Follow-up correspondence for county fairs, state fairs, and plant gates.

General election issue files.

Primary election issue files.

Primary election literature.

Follow-up file - includes follow-up responses to letters, memos, labor and union correspondence.

Ad agency material.

Background research on opponent.

Research on Short's issues.

TV and radio tapes for Primary and General Elections.

Media memos.

File memos on all activities attended by candidate.

Get-out-the-vote.

DNC campaign publications.

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10. (continued)

Congressional district chairmen lists.

Statewide contact list.

Get-out-the-vote files.

Aquatennial parade file.

Coffee party file.

Telephone polling.

State Fair volunteer file.

Special activities file.

County DFL endorsements.

Labor endorsements.

Sportsmen's groups.

State coordinators.

Daily volunteer lists.

Campaign intern lists.

Senior citizens volunteer list.

Administrative follow-up letters.

Issue letters.

Media letters.

Special activity letters.

Special group letters.

Volunteer letters.

Candidate biography.

Candidate position papers.

Mailing materials.

News packet material.

Form letters.

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William C Oldaker
March 23, 1979
Page Eight

10. (continued)

Primary congratulations.

Map file.

General memo files.

American Legion file.

Doctor's for Short file.

Veteran Group File.

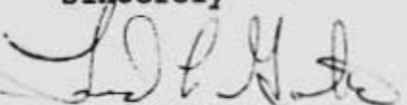
Precinct finder file.

11. The committee records are presently in the custody of the former Campaign Manager, Fred L Gates, and are stored for safe-keeping.

12. Not applicable.

I hope that the answers to the above questions are full and complete to the satisfaction of the Federal Election Commission. If you have any additional information that you should need, please do not hesitate to contact me.

Sincerely


Fred L Gates
Formerly Campaign Manager
Short for Senate Committee of Volunteers

(Enc.)

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1. Robert Sager 283
2. Phyllis Sager sa
3. Huberta Bennett 1
4. Collen Jacobson R
5. Rachael Bliss
6. Nathan Bliss
7. L. Halverson 208
8. Tom Tierney 117
9. A. Tierney sam
10. Mr. Lee Dingmann
11. Mrs. Lee Dingman
12. Mr. Urban Schleppe
13. Mrs. Urban Schleppe
14. Mr. Elmer Wehlege
15. Mrs. Elmer Wehlege
16. Mr. Ed O'Connor
17. Mrs. Ed O'Connor
18. Mr. Marion Durr
19. Mrs. M. Durr
20. Mr. Henry Cash
21. Mrs. H. Cash
22. Mr. Robert Mohs
23. Mrs. R. Mohs
24. Mrs. Rosemary Menke
25. Mrs. John Brix
26. LeRoy A. Mantkey 3
27. Mary Ann Perleberg
28. Leo Perleberg
29. Jim Kummet
30. Jan Kummet
31. Herb Stumpf
32. Elvira Stumpf
33. Pat Schilling
34. Richard Schilling
35. Kathy Hanowski
36. Peter Hanowski
37. Mary Ann Stein
38. Dr. R. J. Stein
39. Jill Rice 2220 V.
40. Mary Ann Bownik 2
41. Dan Rossini 1544
42. Mrs. D. Rossini
43. Dr. J. Cella
44. Mrs. Joseph Cella
45. Mr. Pat Moore
46. Mrs. Pat Moore
47. Mr. Earling Rice
48. Mrs. Earling Rice
49. Mr. John Linstroth
50. Mrs. J. Linstroth
51. Mr. Paul Hutah
52. Mrs. Paul Hutah
53. Mr. E. S. Conover
54. Mrs. E. S. Conover
- 55.. Wayne Matschullat
56. Mrs. W. Matschullat

57. Mr. James Tracy
58. Mrs. James Tracy
59. Dr. Joseph Caramella

1041. John Mattson 925-6
 1042. William C. Smith 2528
 1043. Dr. Joseph Cella 4504
 1044. Patricia Cella } See A
 1045. Shabrir Chavanfa 1921
 1046. Flora Hagglund
 1047. Jean Walker
 1048. Mary Liebsch
 1049. Ron Schweitz
 1050. Jackie Schweitz
 1051. Ron Krammer
 1052. Kris Krammer
 1053. Alberta Johnson
 1054. Lawrence Johnson
 1055. Carol Hughes
 1056. Dave Hughes
 1057. Pat Krystosek
 1058. Ed Krystosek
 1059. Silvia Jensen
 1060. Elvera Cullen
 Roger Amundson
 1062. Carol Amundson
 1063. Virgil Burger
 1064. Bernie Burger
 1065. Brian Walker
 1066. Larry Engleman
 1067. William Fogarty
 1068. Shawn Mark
 1069. Clayton Mark
 1070. Robert Protz
 1071. Joanne Protz
 1072. Jane Krammer (1046-1072)
 1073. Dr. Joseph Garamella
 1074. Mr. & Mrs. James Tracy
 1075. Mr. Wayne Matschullat
 1076. Mrs. Wayne Matschullat
 1077. ~~Mr. F. C. Gonsou~~
 1078. ~~Mrs. D. C. Gonsou~~
 1079. Mr. Paul Hutch
 1080. Mrs. Paul Hutch
 1081. Mrs. John Linstroth
 1082. Mr. Earling Rice
 1083. ~~Mrs. Earling Rice~~
 1084. Mary Ann Pearleberg
 1085. Leo Pearleberg
 1086. Jim Kummet
 1087. Jan Kummet
 1088. Herb Stumpf
 1089. Elvira Stumpf
 1090. Pat Schilling
 1091. Richard Schilling
 1092. Kathy Hanowski
 1093. Peter Hanowski
 1094. Mary Ann Stein
 1095. Dr. R. J. Stein
 1096. Sister Eugene Marie Earl
 1097. Sister Alice Veronica
 1098. Stanley Smith
 1099. Ray Vavrosky
 1100. Richard Zasada
 1101. Virginia Zasada
 1102. Frank Jandric
 1103. Cooky Jandric
 1104. Michel O'Brien Jr.
 1105. Mr. Pete Boerboon
 1106.
 1107.
 1108.
 1109.
 1110.
 1111.

NAME

989-50 Laura Beckmann
 990-51 Marvin Berg
 991-52 Michelle Wolfe

992. Ed Gamradt 30
 993. Gary Gustafson
 994. Ruth Holmgren
 995. Mrs. C.A. Pete
 996. Mrs. R. Morga
 997. Mrs. G. Sauer
 998. Doug Sexton
 999. Chris Holmgren
 1000. Mary Weiss
 1001. Ed Weiss
 1002. Thomas Murphy
 1003. Rosemary Pille
 1004. Kathy Jo Brock
 1005. Jerry Soderber
 1006. Marlys Soderber
 1007. James E. Murr
 1008. Ron Betlach
 1009. Bill Hamm 241
 1010. Jim Wolvert
 1011. Mr. Edward Moe
 1012. Mrs. Edward Mo
 1013. William Dunnig
 1014. Francis Hoseh
 1015. Mrs. Francis E
 1016. Andrew Poliach
 1017. Robert Vogel
 1018. Mrs. Robert Vo
 1019. Richard Hennig
 1020. George Kadadek
 1021. Dr. Joseph Dup
 1022. Mrs. J. Dupon
 1023. Ralph Matudka
 1024. Jake Viller
 1025. Gretchen Mille
 1026. John L. Reibol
 1027. Brett Stangela
 1028. Mrs. Florence
 1029. Clifford Thors
 1030. Bernice Thorse
 1031. Kathy Johnson
 1032. Roger Reinhard
 1033. Sandy Reinhard
 1034. Jerry Reinhard
 1035. Steven Reinhar
 1036. Ed Stransky
 1037. Theresa Strans
 1038. Gordy Stransky
 1039. Gary Stransky
 1040. Carol Stransky

Short Support

NAME			
40. Louis R. Cernjar	809. Mary Thomas	886. Mrs. Marian Brissel	
41. Elsie A. Cernjar	810. Joseph Thomas	887. Tim Getman	
42. William Bolish	811. Daria Morris	888. Mary Getman	
43. Lawaina Bolish	812. Lynn Carlson 12096 F	889. Nic Meyers	
44. Al Shapiro	813. R. Scott Bryngelson	890. Kay Meyers	
45. Marilyn Shapiro	814. Lola Hepburn	891. Mrs. Gail Schwich	
46. Glen Brett	815. Patrick Hepburn	892. Mr. Dave Weis	
47. Elsie Brett	816. Mr. Willam Quinn } Sr.	893. Mrs. Janet Mulhern	
48. Leonard Ruzynski	817. Mrs. Susan Quinn } 1	894. Dennis Leibold	
49. Holly Ruzynski	818. Einar Andren	895. Barb Leibold	
50. John A. Erickson	819. Craig Alshorise	896. Mrs. Karen Kelnhoffer	
51. Dan Bernard	820. Julius Perl	897. Marion Biessel	
52. Jim Cunningham	821. Arne Gunderson } 1	898. Bob Biessel	
53. Jay Gallagher	822. Mildred Gunderson } 1	899. Mary Henkels	
54. Marge Gallagher	823. Frank Buetel } 1	900. Ken Henkels	
55. Robert La Pitz	824. Joan Buetel } 1	901. Mrs. Bob Harens	
56. John Maki (& Mrs.)	825. Stuart Johnson	902. Richard Stubee	
57. Ted Schmidt	826. Clark Griffith	903. Berniva Stubee	
58. Ceil Schmidt	827. Frank Barrett	904. Mike Harens	
59. Dale C Horner	828. Margaret Walter	905. Willy Von Holtum	
60. Vince Jones	829. Mark Misukanis } 1	906. Norma Von Holtum	
61. Joseph McGaffey	830. Jay Misukanis } 1	907. Sharon Klosterman	
62. Victor W McKeown	831. Geraldine Flannigan	908. Pat Hartman	
63. E Roger Schwartz	832. Delores Schloesser	909. Jim Cook	
	833. Geraldine Lackowitz	910. Mary Cook	
	834. Kathy Turcotte	911. Jeanett Roetzel	
	835. Margaret M. Radousk	912. Frank Roetzel	
	836. Arlene Radousk	913. Jane Molitor	
	837. Ena M. Guidarelli	914. Bob Baumgartner	
	John Yancheck 750 Bayar	915. Kathy Baumgartner	
	839. Mary Osiecki } 1	916. Vern Hunt	
	840. John Yancheck	917. Sarah Hunt	
	841. Mark Osiecki } 1	918. Larry Hokanson	
	842. Sue Osiecki	919. Willard Landreville	
	843. Gary Mitchell	920. Harold Haubrich	
	844. Ivis Mitchell	921. Levin Vagle	
	845. Mrs. Jim Hutchinson	922. Ben Lutterman	
	846. Mrs. John Yancheck	923. Ann Lutterman	
	847. Peter Hauser	924. Gus King	
	848. Jack Carson 1814 Dup	925. Sandy King	
	849. Melva Carson	926. Eunice Fernholz	
	850. Richard Mitchell	927. Merl Fernholz	
	851. Joe Ray Clark	928. Joanne Knuttile	
	852. Al Peterson 4601 Oli	929. Tom Henderson	
	853. Dorothy Peterson	930. Linda Henderson	
	854. Betty Wood 2105 Emer	931. Ernie Michon	
	855. Mike Ettel	932. Betty Michon	
	856. Sue Johnson	933. Mary Ann Burnside	
	857. Thomas Fitzgerald	934. Cheryl Hiemenz	
	858. Sharon Laie	935. Bob Colwell	
	859. David Henning	936. Rita Colwell	
	860. Arnold Henning	937. Valerie Contlon	
	861. Cel Spartz	938. Len Lindsley	
	862. Duane Spartz	939. Judy Lindsley	
	863. Frank Spartz		
	864. John Cosgrove		
	865. Les Teien 1893 Beck		
	866. Lorraine Teien		
	867. Mrs. I.A. O'Shaugnes		
	868. John Beck 953 Hyaci		
	869. Pat Beck		
	870. Robert Kieger		
	871. Arnold Windschitl }		
	872. Loretta Windschitl }		
	873. Ralph Windschitl }		
	874. Jenny Windschitl }		
	875. Janet Windschitl }		
	876. Leo Windschitl }		
	877. Frances Zetah		
	878. Clarence Nowak } 1		
	879. Maggie Nowak }		
	880. Helen Gamradt		
	881. John Sammon		
	882. John Sammon }		
	883. Mrs. John Sammon }		
	884. Mr. Alva Melhouse		
	885. Mrs. Sally Millard		

436.	Marge Subialka	3	286.	Bonnie Banta		587.	Helen Klingsporr
437.	Al Worm	2	287.	Judy Laube	3	588.	Virginia Daggit
438.	Bill LaDuke	2	288.	Jim Laube	3	589.	Bob Daggit
439.	Mary LaDuke	"	289.	Odiñ G. Nelson		590.	Ron Vietanen
440.	Peggy O'Neil	5	290.	Bob Richie		591.	Marcia Vietanen
441.	Gregory Ennen	2	291.	Virginia Wisner	(v)	592.	Aune Vietanen
442.	Margarette Beerbaum		292.	Myron Anderson		593.	Ven Vietanen
443.	Jerry Herbert	2	293.	Missy Everson	}win	594.	George Boase
444.	Gene Willis	3	294.	Marshall Everson		595.	August Karkinen
445.	Joe Rapacz	3	295.	Mary Everson		596.	Roy Waldron
446.	Collen O'Neil	5	296.	Jeanne Smith	3	597.	Dale Waldron
447.	John Hanzley	3	297.	John F. Smith	3	598.	Gerald Wagner
448.	Mr. Nick Smith	2	298.	Tom D'Aquila		599.	Cathy Wagner
449.	Mr. Martin Laturnus		299.	Lloyd Sims		600.	Pat Klobe
450.	Jim Daugherty	3	300.	Paul R. LaBarre		601.	Steve Fedor
451.	Myra Quinn		301.	Timothy R. Moodie		602.	Edith Bease
452.	Al Pomahatch	5	302.	Barb Finson		603.	JoAnn Surla
453.	Chester L. Whaley	2	303.	Timothy D. Kelly		604.	Miles Surla
454.	Dorothy Sisco	1	304.	William Leadens		605.	John Boase
455.	Deborah Reilly	2	305.	Earl G. Anderson		606.	Cindy Boase
456.	Dores Jepson	2	306.	Danal Bruce Anders		607.	Doris Nakala
457.	Lawrence Lanars	1	307.	Jim Rea		608.	Jackie Geddes
458.	Dorothy Eidson	2	308.	Al Ester		609.	Jim Geddes
459.	Lynn Maciez	2	309.	Lorraine E.V. Pete		610.	Rod Politano
460.	C.L. Dvorak	2	310.	Frank Jandric		611.	Judy Politano
461.	Helen Laturnus	2	311.	Rolf F. Nannestad		612.	Tandy Esala
462.	Julie Klick	3	312.	Beulak Polkowski		613.	Gary Esala
463.	Kathryn LaTourelle		313.	Jack Tillman	3	614.	Vic Vogh
464.	Jeanette Labejho	2	314.	Dolly Tillman	3	615.	Kathy Vogh
465.	Joseph Sisco	1	315.	Sharon Hartmann	3	616.	Mardy Jackson
466.	George Reilly	2	316.	Mark Hartmann	3	617.	Roberta Skogman
467.	LaVern Jepson	2	317.	Howard Milbert		618.	Gary Dkogan
468.	Don Waterman	2	318.	Delia Boening		619.	Rebecca Ketola
469.	Wm. L. Klick	2	319.	Robert P. Milbert		620.	Jerry Ketola
470.	Mabel Lanars	1	320.	Roy C. Weaver		621.	Cathy Carlson
471.	Genevieve Vashro	2	321.	Mrs. Jerry Chapdel		622.	Jim Carlson
472.	Rose Ann Daugherty	3	322.	Dr. Jeffrey M. Mil		623.	Leroy Ping
473.	Terry Corbett	2	323.	Corinne Diffley		624.	Bev West
474.	Dick Taylor	2	324.	Miss Rosemary Diffley		625.	David West
475.	Lois Taylor	3	325.	Mr. Leo Voeltl	3	626.	Jim Nelson
476.	Frank Switzer	2	326.	Mrs. Leo Voeltl	3	627.	Diane Nelson
477.	Ron Stauffer	14	327.	David Stookey		628.	Ruth Murphy
478.	Jayne Stauffer	"	328.	Mary F. Wilson		629.	Vi Hildebrandt
479.	Robert Smith	50	329.	Peggy Moen		630.	Ruth Zalenco
480.	Jack Slattery	4	330.	Barbara Mason		631.	Dainis Zalenco
481.	M.L. "Buz" Sychs	34	331.	Craig Mason		632.	Irene Delaby
482.	Martin Cunningham		332.	Howard Emery		633.	Shirley Rosema
483.	Carl Rudolph	32	333.	Dan Berg		634.	Lewis Kjorstad
484.	Bill Bush		334.	Wm. Pariseau		635.	Louise Kjorstad
485.	Thomas A. Rocheford		335.	Michael Casey	3	636.	Charles Herman
486.	Phillip Ratte	17	336.	Joseph Casey	3	637.	Martha Hermann
487.	Eloise Pohlad	48	337.	Thomas Casey	3	638.	Gladys Ashley
488.	Don Makowske	29	338.	Ralph Meyer	3	639.	Ray Ashley
489.	Judy Makowske	"	339.	Merlaine Meyer	3	640.	Jim Ashley
490.	Diane Slick	34	340.	R. "Bud" Peterson	3	641.	Bill Burgess
491.	Patricia Schroeder		341.	Alice Peterson	3	642.	Jeanne Burgess
492.	Mike Fleming	56	342.	Dr. Andrew Shea	3	643.	Linda Oreskov
493.	Dorothy Fleming	3	343.	Rosemary Shea	3	644.	David Oreskov
494.	Mary Senander**	12	344.	Dan Pardy		645.	Joe Moriarity
495.	Kathy Sackett	51	345.	Karen Pardy		646.	Carl Glaven
496.	Florence Caninger	19	346.	Dave Jacobs		647.	Leo LaLonde
497.	Mike Daninger	"	347.	Kathy Swanson		648.	George Hunter
498.	John Nevin	42	348.	Rebecca Smith		649.	Bernard Marsn
499.	Mayme Neilson	41	349.	Rebecca Smith		650.	Alrene Mattila
500.	Wendy Michelson	57	350.	Douglas Hiljus	3	651.	Eugene Simons
501.	Sarah Michels	16	351.	Sharon Hiljus	3	652.	Elgin Gunders
502.	Maynard Mecay	67	352.	Sue Lenarz		653.	Dennis Wagner
503.	James E. McNeil	12	353.	Orville Erie	3	654.	Judy Wagner
504.	John Linnehan	54	354.	Dorothy Erie	3	655.	Eli Mayer
505.	Annette Wahl	Ew	355.	Irene Festin		656.	Siri Poehls
506.	Ann LeFebvre	29	356.	Bill Cariveau		657.	Art Poehls
507.	Joan Hartman	32	357.	Jay Simmons		658.	Greg Okley
508.	Sm Quinn, Jr.	58	358.	Rebecca Smith	3	659.	Russ Rascuzzi
509.	Francis DeRudder	16	359.	Rebecca Smith	3	660.	Dour Nakari
510.	James L. Dorr	10	360.	Gerald King			Douglas "
511.	Walter Eggert	28	361.	Anne Olson			

135 Mary Jeanne Levitt
 136 Dr. S.H. Levitt
 137 Mrs. S.H. Levitt
 138 Scott Levitt
 139 John Walsh
 140 Jean Walsh
 141 Mary Jo Walsh
 142 Helene Walsh
 143 James Walsh
 144 Steven Carter
 145 Todd Jones
 146 Victor Coleman
 147 Mark Volpe
 148 Ellen Kratt
 149 Rose Christianson
 150 Ron Starks
 151 James Orr
 152 Neil DeGroot
 153 Scott Lanier
 154 Marc Smotherson
 155 Ricardo Soloman
 156 ~~Elizabeth~~
 157 Lizette Evans
 158 ~~Elizabeth~~
 159 ~~Elizabeth~~
 160 ~~Elizabeth~~
 161 ~~Elizabeth~~
 162 ~~Elizabeth~~
 163 Jeff True
 164 Bill Erhart
 165 Dolores Erhart
 166 Albrecht Erhart
 167 Dan Erhart
 168 Kathy Erhart
 169 Bob Stransky
 170 Vicky Stransky
 171 John Weis
 172 ~~John Weis~~
 173 Jens Christenson
 174 Staly Gentry
 175 Mike Foster
 176 Mary Ann Foster
 177 Dr. David O'Steen
 178 Darla St. Martin
 179 ~~Elizabeth~~
 180 Jerry Dibble
 181 Jim Hall
 182 Terry Durkin
 183 Buzz Danzel
 184 Bob Brunig
 185 Tony Braga
 186 Dudley Olson
 187 Kathy Dibble
 188 Ron Ousky
 189 Gloria Davidson
 190 A. Davidson
 191 Bill Dolan
 192 Mia Myklebust
 193 Monica Shephard
 194 Patricia McCoy
 195 Michael Berndt
 196 Lloyd Busch
 197 Den Prehal
 198 Ken Ornberg - 1907 m. n.
 199 Greg Milnar
 200 Scott Proshek - 1907 m. n.
 201 Tony Baldwin
 202 Don Slusaeski
 203 Mike Twist
 204 Mike Lehn
 205 Maureen Warren
 206 Joe Dudley, Sr.
 207 Joe Dudley, Jr.
 208 Tom Ryback
 209 ~~Butch Richards~~

210. Mr. Keith Otzen
 211. Orla Otzen
 212. Paul Lemieux
 213. Marti Lemieux
 214. Mr. Bob Casey
 215. Mrs. Rosemary Cas
 216. Ms. Pauli Walkows
 217. Mrs. Barbara McCl
 218. Antonio Felicetta
 219. Carol Felicetta
 220. Gina Felicetta
 221. Gerald Felicetta
 222. Margaret Felicett
 223. Paul Heit
 224. Dorothy Vorwerk
 225. Sammy Tims
 226. ~~Sammy Tims~~
 227. ~~Sammy Tims~~
 228. Loretta Hansen
 229. Leo Hansen
 230. Mr. Ralph Meyer
 231. ~~Sammy Tims~~
 232. ~~Sammy Tims~~
 233. Mrs. Barbara Cobb
 234. Mrs. Grace Stroebe
 235. Joe Newburger
 236. Alan Ballou
 237. Carol Bartels
 238. Morris Bergsrud
 239. Einor Bjork
 240. Leo Brower
 241. June Brower
 242. Alford Carlson
 243. Leo Deal
 244. Mrs. Christ Gjenst
 245. Wally Johnson
 246. Ruby Jorgenson
 247. Dorothy Koivisto
 248. Wm "Billy" Larkin
 249. Orville Larson
 250. Estelle Mullins
 251. A.L. Nelson
 252. Lawrence Pervenz
 253. Miss Enis Peyton
 254. Dale Pommerville
 255. Leo Skafda
 256. Joe Weisinger
 257. John Hoffman
 258. Kathy Knowles
 259. Kathy McClure
 260. Bill McClure
 261. Doyle Rose
 262. Eugene A. Boe
 263. Verla Farmer
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 265. Bernie Hess
 266. Bernard Hess
 267. Philomena Hess
 268. Ann Reinke
 269. C. Stewart
 270. J.B. Stewart
 271. W.A. Stewart
 272. Dr. John Doyle
 273. Debbie Doyle
 274. Mary Goad
 275. LuAnn Hames
 276. Ned Hames
 277. Dick Stockness
 278. Dan O'Keefe
 279. John Naslund
 280. Tom Weber
 281. Mary Weber
 282. John F. Bonner III
 283. Carol Bonner
 284. Dave Susag
 285. Paulette Joyer

362. Marc Smotherson
 363. Kathleen M. Willia
 364. Mr. Ken Bergman
 365. LaVonne Harwood
 366. Ed Mantonich
 367. Judy Mantonich
 368. Sheila Haeg
 369. Gregory Haeg
 370. Dave Schmit
 371. Mary Schmit
 372. Rita Ryan
 373. John Ryan
 374. Mr. David Rau Kel
 375. Mrs. David Rau Ke
 376. Penney Bernier
 377. Chelly Anderson
 378. Kay Baumgartner
 379. Bill Plante
 380. Beverly Knutson
 381. ~~Linda Knutson~~
 382. Barry McKee
 383. Art Posingies
 384. ~~David Posingies~~
 385. ~~David Posingies~~
 386. Dave Lafontaine
 387. ~~Cindy Tibbels~~
 Karen Jones
 389. Ron Bacigalupo
 390. Mayor Richard Hu
 391. ~~Jim Hu~~
 392. ~~Jim Hu~~
 393. ~~Jim Hu~~
 394. Dolly Shraha
 395. Nick Overby
 396. Dorothy Rapacz
 397. Chris Baher
 398. Phillip Byrne
 399. Bernice M. Byrn
 400. Delia Beoning
 401. Terry Boman
 402. Linda Piwnica
 403. Steven Zewach
 404. Bill Youngdahl
 405. Lorretta Youngd
 406. Betty Wood
 407. Bob Ripsin
 408. Kathleen M. Wil
 409. ~~Terry Todd~~
 Frank Spreitzer
 411. Thomas Ribus
 412. Mary Courteau
 413. Fary Courteau
 414. Marge Lubke
 415. Millie Schmit
 416. Richard Huizel
 417. Henry F. Beaud
 418. Donald P. Cash
 419. Thomas Foss
 420. Marcella Moega
 421. Blanche O'Conn
 422. Donald O. Davi
 423. Norbert M. Deh
 424. Ray Gustafson
 425. Patricia Gusta
 426. James Setten
 427. Edward Eppler
 428. Gerald Szyman
 429. Gary Roberts
 430. Helen Schmit
 431. Ron Lundeen
 432. Grace Lundeen
 433. John Waytas
 434. Jeff Caldor
 435. Ray Subialka

436. Marge Subialka
 437. Al Worm
 438. Bill LaDuke
 439. Mary LaDuke
 440. Peggy O'Neil
 441. Gregory Ennen
 442. Margarette Beerbaum
 443. Jerry Herbert
 444. Gene Williams
 445. Joe Rapacz
 446. Collen O'Neil
 447. John Hanzley
 448. Mrs. Nick Overby
 449. Mr. Martin Laturnus
 450. Jim Daugherty 3
 451. Myra Quinn
 452. Al Pomahatch 5
 453. Chester L. Whaley 2
 454. Dorothy Sisco 1
 455. Deborah Reilly 2
 456. Doris Jepson 2
 457. Lawrence Lanars 1
 458. Dorothy Eidson 2
 459. Lynn Maciez 2
 460. C.L. Dvorak 2
 461. Helen Laturnus 2
 462. Julie Klick 3
 463. Kathryn LaTourelle
 464. Jeanette Labejko 2
 465. Joseph Sisco 1
 466. George Reilly 27
 467. LaVern Jepson 29
 468. Don Waterman 26
 469. Wm. L. Klich 29
 470. Mabel Lanars 19
 471. Genevieve Vashro 26
 472. Rose Ann Daugherty 3
 473. Terry Corbett 23
 474. Dick Taylor 26
 475. Lois Taylor "
 476. Frank Switzer 28
 477. Ron Stauffer 14
 478. Jayne Stauffer "
 479. Robert Smith 50
 480. Jack Slattery 43
 481. M.L. "Buz" Sychs 34
 482. Martin Cunningham
 483. Carl Rudolph 324
 484. Bill Bush
 485. Thomas A. Rocheford
 486. Phillip Ratte 171
 487. Eloise Pohlad 481
 488. Don Makowske 291
 489. Judy Makowske** "
 490. Diane Slick 340
 491. Patricia Schroeder 2
 492. Mike Fleming 563
 493. Dorothy Fleming**
 494. Mary Senander** 120
 495. Kathy Sackett 513
 496. Florence Caninger 194
 497. Mike Daninger "
 498. John Nevin 422
 499. Mayme Neilson 411
 500. Wendy Michelson 573
 501. Sarah Michels 167
 502. Maynard Mecay 670
 503. James E. McNeil 1201
 504. John Linnehan 5428
 505. Annette Wahl Ewin
 506. Ann LeFebvre 2910
 507. Joan Hartman 320
 508. Sm Quinn, Jr. 5800
 509. Francis DeRudder 1610
 510. James L. Dorr 1025
 511. Walter Eggert 2818

1 Clara Pervis
 2 Bob Pering
 3 Terry Coleman
 4 Mike Donahue
 5 Peggy Rancourt
 6 Bob Rancourt
 7 Marc Stanski
 8 Barry Bauer
 9 Betty Dotseth
 10 Margaret White
 11 Al White
 12 Kim Ranczka
 13 Cathy Desmond
 14 Tom Desmond
 15 Jo McKasy
 16 Ma Beery
 17 Laurene Bixby
 18 Mary Canaughty
 19 Ollie Burgess
 20 Phillip Byrne
 21 Glen Carlsen
 22 Austin Carlson
 23 Dorothy Conlon
 24 Marianne Coughli
 25 Elsie DeYoung
 26 Bill Gendon
 27 Anne Forystek
 28 Fay Frawley
 29 Margaret Gaines
 30 John Gallagher
 31 Robert Irving
 32 Col AF Johnson
 33 Andrew Jones
 34 Jack Kerns
 35 Frank Klingberg
 36 Bentley Smith, J
 37 Bernadette Kouch
 38 Helen LeDeuser
 39 Frank LeDeuser
 40 Elmer Lindbloom
 41 Martha Lindbloom
 42 Bob Lofties
 43 Harold Martinson
 44 Dan McLaughlin
 45 Ralph Meyer
 46 LeRoy Newell
 47 Owen Nichols
 48 Oscar Pederson
 49 Lorraine Peterso
 50 John Sammon
 51 Melvin Schmidt
 52 ~~Joe Schrin~~
 53 Muriel Zechlin
 54 Emil Dreher
 55 Lorraine Cotler
 56 Joe Sherin
 57 Doug Swanson
 58 Kathy Swanson
 59 Lyle Brown

60 Pat Richards
 61 Imagene Schopf
 62 Victor DeYoung
 63 Elsie DeYoung
 64 Bill Hogan
 65 Walter Schopf
 66 Shirley Cannella
 67 Janice Jungwirth
 68 John Emerson
 69 Eleanor Brendon
 70 Lillian Newman
 71 ~~Mike Mickey~~
 72 ~~John~~
 73 Juanita LaBelle and Ju
 74 ~~John~~
 75 George Hickey } me & me
 76 Mrs. G. Hickey
 77 Bill Davis
 78 ~~John~~
 79 Jeanne Krumpelmann
 80 Tom Krumpelmann
 81 Tom Jenson
 82 Sharon Jenson } and
 83 Erik Jenson } family
 84 Amy Jenson
 85 Mr. Lloyd Jenson
 86 Mrs. Lloyd Jenson
 87 ~~John~~
 88 Pat Garin
 89 Kathleen Davy
 90 Will Davy
 91 Reuben Fraser, Jr.
 92 James Shovelain
 93 Robert Foster
 94 Linda Mohs Foster
 95 Pat Trow
 96 Joe O'Leary
 97 Ginny O'Leary
 98 Debbi Brock
 99 Pat Mantiatis
 100 Martha Hockel
 101 Robin Hartney
 102 Tony Renella
 103 Pam Renella
 104 Lane Hagemeyer
 105 Steve Larson
 106 Les Hagemeyer
 107 Richard Koch
 108 Joan Hagemeyer
 109 Nancy Erickson
 110 Chris Pattock
 111 Leo Schultz
 112 Peggy Schultz
 113 Brian Rice
 114 Mike Foster
 115 Kathleen Trow
 116 Dr. Wm H. Trow
 117 Mrs. Wm. H. Trow
 118 John Lindsey
 119 Dave Desmidt
 120 Cletus L. Swan
 121 Charlie Dillon
 122 Geneva Silseth
 123 Irene Hamman
 124 ~~John~~
 125 Ronald Jewett
 126 Robert Jewett
 127 Renee Jewett
 128 Colleen Jewett
 129 Doris Lynn Jewett
 130 Rusty Jewett
 131 Jim Cunningham
 132 Janice Cunningham
 133 Harold Wilke
 134 Marge Wilke

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587. ✓ Helen Klingsporr
 588. ✓ Virginia Daggit
 589. ✓ Bob Daggit
 590. ✓ Ron Vietanen
 591. ✓ Marcia Vietanen
 592. ✓ Aune Vietanen
 593. ✓ Ven Vietanen
 594. ✓ George Boase
 595. ✓ August Karkinen
 596. ✓ Roy Waldron
 597. ✓ Dale Waldron
 598. ✓ Gerald Wagner
 599. ✓ Cathy Wagner
 600. ✓ Pat Klobe 501
 601. ✓ Steve Fedor 354
 602. ✓ Edith Bease
 603. ✓ JoAnn Surla
 604. ✓ Miles Surla
 605. ✓ John Boase
 606. ✓ Cindy Boase
 607. ✓ Doris Nakala
 608. ✓ Jackie Geddes
 609. ✓ Jim Geddes
 610. ✓ Rod Politano
 611. ✓ Judy Politano
 612. ✓ Tandy Esala
 613. ✓ Gary Esala
 614. ✓ Vic Vogh
 615. ✓ Kathy Vogh
 616. ✓ Mardy Jackson
 617. ✓ Roberta Skogman
 618. ✓ Gary Skogman
 619. ✓ Rebecca Ketola
 620. ✓ Jerry Ketola
 621. ✓ Cathy Carlson
 622. ✓ Jim Carlson
 623. ✓ Leroy Ping
 624. ✓ Bev West
 625. ✓ David West
 626. ✓ Jim Nelson
 627. ✓ Diane Nelson
 628. ✓ Ruth Murphy
 629. ✓ Vi Hildebrandt
 630. ✓ Ruth Zalenco
 631. ✓ Dainis Zalenco
 632. ✓ Irene Delaby
 633. ✓ Shirley Roseman
 634. ✓ Lewis Kjorstad
 635. ✓ Louise Kjorstad
 636. ✓ Charles Hermann
 637. ✓ Martha Hermann
 638. ✓ Gladys Ashley
 639. ✓ Ray Ashley
 640. ✓ Jim Ashley
 641. ✓ Bill Burgess
 642. ✓ Jeanne Burgess
 643. ✓ Linda Oreskovich
 644. ✓ David Oreskovich
 645. ✓ Joe Moriarity
 646. ✓ Carl Glaven
 647. ✓ Leo LaLonde 309 W.
 648. ✓ George Hunter
 649. ✓ Bernard Marsnik
 650. ✓ Alrene Mattila
 651. ✓ Eugene Simonson
 652. ✓ Elgin Gunderson
 653. ✓ Dennis Wagner
 654. ✓ Judy Wagner
 655. ✓ Eli Mayer
 656. ✓ Siri Poehls 1469 C
 657. ✓ Art Poehls
 658. ✓ Greg Okley 12186 Dr
 659. ✓ Russ Rascuzzi
 660. ✓ Dour Nakri RR1 Box

587. Helen Klingsporr
 588. ~~Virginia Daggit~~
 589. ~~Bob Daggit~~
 590. Ron Vietanen
 591. Marcia Vietanen
 592. Aune Vietanen
 593. Ven Vietanen
 594. George Boase
 595. August Karkinen
 596. Roy Waldron
 597. Dale Waldron
 598. Gerald Wagner
 599. Cathy Wagner
 600. Pat Klobe 50
 601. Steve Fedor 35
 602. Edith Bease
 603. JoAnn Surla
 604. Miles Surla
 605. John Boase
 606. Cindy Boase
 607. Doris Nakala
 608. Jackie Geddes
 609. Jim Geddes
 610. Rod Politano
 611. Judy Politano
 612. Tandy Esala
 613. Gary Esala
 614. Vic Vogh
 615. Kathy Vogh
 616. Mardy Jackson
 617. Roberta Skogman
 618. Gary Dkogman
 619. Rebecca Ketola
 620. Jerry Ketola
 621. Cathy Carlson
 622. Jim Carlson
 623. Leroy Ping
 624. Bev West
 625. David West
 626. Jim Nelson
 627. Diane Nelson
 628. Ruth Murphy
 629. Vi Hildebrandt
 630. Ruth Zalenco
 631. Dainis Zalenco
 632. Irene Delaby
 633. Shirley Roseman
 634. Lewis Kjorstad
 635. Louise Kjorstad
 636. Charles Hermann
 637. Martha Hermann
 638. Gladys Ashley
 639. Ray Ashley
 640. Jim Ashley
 641. Bill Burgess
 642. Jeanne Burgess
 643. Linda Oreskovich
 644. David Oreskovich
 645. Joe Moriarity
 646. Carl Glaven
 647. ~~Leo LaLonde~~ 309
 648. George Hunter
 649. Bernard Marsnik
 650. Alrene Mattila
 651. Eugene Simonson
 652. Elgin Gunderson
 653. Dennis Wagner
 654. Judy Wagner
 655. Eli Mayer
 656. ~~Siri Poehls~~ 14
 657. ~~Art Poehls~~
 658. ~~Greg Okley~~ 1218
 659. Russ Rascuzzi
 660. Dour Nakri RR1

NAME
 940. Louis R. Cernjar
 941. Elsie A. Cernjar
 942. William Bolish
 943. Lawaina Bolish
 944. Al Shapiro
 945. Marilyn Shapiro
 946. Glen Brett
 947. Elsie Brett
 948. Leonard Ruzynski
 949. Holly Ruzynski
 950. John A. Erickson
 951. Dan Bernard
 952. Jim Cunningham
 953. Jay Gallagher
 954. Marge Gallagher
 955. Robert La Pitz
 956. John Maki (& Mrs.)
 957. Ted Schmidt
 958. Ceil Schmidt
 959. Dale C Horner
 960. Vince Jones
 961. Joheph McGaffey
 962. Victor W McKeown
 963. E Roger Schwartz

✓60 Pat Richards
 ✓61 Imogene Schopf
 ✓62 Victor DeYoung
 ✓63 Elsie DeYoung
 ✓64 Bill Hogan
 ✓65 Walter Schopf
 ✓66 Shirley Cannella
 ✓67 Janice Jungwirth
 ✓68 John Emerson
 ✓69 Eleanor Brendon
 ✓70 Lillian Newman
~~71 [Name]~~
~~72 [Name]~~
 ✓73 Juanita LaBelle
 ✓74 Cliff Carlson
 ✓75 George Hickey
 ✓76 Mrs. G. Hickey
 ✓77 Bill Davis
 ✓78 Jim LaBelle
 ✓79 Jeanne Krumpelmann
 ✓80 Tom Krumpelmann
 ✓81 Tom Jenson
 ✓82 Sharon Jenson
 ✓83 Erik Jenson
 ✓84 Amy Jenson
 ✓85 Mr. Lloyd Jenson
 ✓86 Mrs. Lloyd Jenson
~~87 [Name]~~
 ✓88 Pat Garin
 ✓89 Kathleen Davy
 ✓90 Will Davy
 ✓91 Reuben Fraser, Jr.
 ✓92 James Shovelain
 ✓93 Robert Foster
 ✓94 Linda Mohs Foster
 ✓95 Pat Trow
 ✓96 Joe O'Leary
 ✓97 Ginny O'Leary
 ✓98 Debbi Brock
 ✓99 Pat Mantiatis
 ✓100 Martha Hockel
 ✓101 Robin Hartney
 ✓102 Tony Renella
 ✓103 Pam Renella
 ✓104 Lane Hagemeyer
 ✓105 Steve Larson
 ✓106 Les Hagemeyer
 ✓107 Richard Koch
 ✓108 Joan Hagemeyer
 ✓109 Nancy Erickson
 ✓110 Chris Pattock
 ✓111 Leo Schultz
 ✓112 Peggy Schultz
 ✓113 Brian Rice
 ✓114 Mike Foster
 ✓115 Kathleen Trow
 ✓116 Dr. Wm. H. Trow
 ✓117 Mrs. Wm. H. Trow
 ✓118 John Lindsey
 ✓119 Dave Desmidt
 ✓120 Cletus L. Swan
 ✓121 Charlie Dillon
 ✓122 Geneva Silseth
 ✓123 Irene Hammann
~~124 [Name]~~
 ✓125 Ronald Jewett
 ✓126 Robert Jewett
 ✓127 Renee Jewett
 ✓128 Colleen Jewett
 ✓129 Doris Lynn Jewett
 ✓130 Rusty Jewett
 ✓131 Jim Cunningham
 ✓132 Janice Cunningham
 ✓133 Harold Wilke
 ✓134 Marge Wilke

✓286. Bonnie Banta
 ✓287. Judy Laube
 ✓288. Jim Laube
 ✓289. Odin G. Nelson
 ✓290. Bob Richie
 ✓291. Virginia Wisner ()
 ✓292. Myron Anderson
 ✓293. Missy Everson
 ✓294. Marshall Everson
 ✓295. Mary Everson
 ✓296. Jeanne Smith
 ✓297. John F. Smith
 ✓298. Tom D'Aquila
 ✓299. Lloyd Sims
 ✓300. Paul R. LaBarre
 ✓301. Timothy R. Moodie
 ✓302. Barb Finson
 ✓303. Timothy D. Kelly
 ✓304. William Leadens
 ✓305. Earl G. Anderson
 ✓306. Danal Bruce Ander
 ✓307. Jim Rea
 ✓308. Al Ester
 ✓309. Lorraine E.V. Pet
 ✓310. Frank Jandric
 ✓311. Rolf F. Nannestad
 ✓312. Beulak Polkowski
 ✓313. Jack Tillman
 ✓314. Dolly Tillman
 ✓315. Sharon Hartmann
 ✓316. Mark Hartmann
 ✓317. Howard Milbert
 ✓318. Delia Boening
 ✓319. Robert P. Milbert
 ✓320. Roy C. Weaver
 ✓321. Mrs. Jerry Chapde
 ✓322. Dr. Jeffrey M. Mi
 ✓323. Corinne Diffley
 ✓Miss Rosemary Diffley
 ✓325. Mr. Leo Voeltl
 ✓326. Mrs. Leo Voeltl
 ✓327. David Stookey
 ✓328. Mary F. Wilson
 ✓329. Peggy Moen
 ✓330. Barbara Mason
 ✓331. Craig Mason
 ✓332. Howard Emery
 ✓333. Dan Berg
 ✓334. Wm. Pariseau
 ✓335. Michael Casey
 ✓336. Joseph Casey
 ✓337. Thomas Casey
 ✓338. Ralph Meyer
 ✓339. Merlaine Meyer
 ✓340. R. "Bud" Peterson
 ✓341. Alice Peterson
 ✓342. Dr. Andrew Shea
 ✓343. Rosemary Shea
 ✓344. Dan Pardy
 ✓345. Karen Pardy
 ✓346. Dave Jacobs
 ✓347. Kathy Swanson
 ✓348. Rose Meath
 ✓349. Ruth Clark
 ✓350. Douglas Hiljus
 ✓351. Sharon Hiljus
 ✓352. Sue Lenarz
 ✓353. Orville Erie
 ✓354. Dorothy Erie
 ✓355. Irene Festin
 ✓356. Bill Cariveau
 ✓357. Jay Simmons
~~358. [Name]~~
~~359. [Name]~~
 ✓360. Gerald King
 ✓361. Anne Olson

✓1 Clara Pervis
 ✓2 Bob Pering
 ✓3 Terry Coleman
 ✓4 Mike Donahue
 ✓5 Peggy Rancourt
 ✓6 Bob Rancourt
 ✓7 Marc Stansiaski
 ✓8 Barry Bauer
 ✓9 Betty Dotseth
 ✓10 Margaret White
 ✓11 Al White
 ✓12 Kim Ranczka
 ✓13 Cathy Desmond
 ✓14 Tom Desmond
 ✓15 Jo McKasy
 ✓16 Mac Beery
 ✓17 Laurene Bixby
 ✓18 Mary Cannaughty
 ✓19 Ollie Burgess
 ✓20 Phillip Byrne
 ✓21 Glen Carlsen
 ✓22 Austin Carlson
 ✓23 Dorothy Conlon
 ✓24 Marianne Coughlin
 ✓25 Elsie DeYoung
 ✓26 Bill Gendon
 ✓27 Anne Forystek
 ✓28 Fay Frawley
 ✓29 Margaret Gaines
 ✓30 John Gallagher
 ✓31 Robert Irving
 ✓32 Col AF Johnson
 ✓33 Andrew Jones
 ✓34 Jack Kerns
 ✓35 Frank Klingberg
 ✓36 Bentley Smith, Jr.
 ✓37 Bernadette Kouch
 ✓38 Helen LeDeuser
 ✓39 Frank LeDeuser
 ✓40 Elmer Lindbloom
 ✓41 Martha Lindbloom
 ✓42 Bob Lofties
 ✓43 Harold Martinson
 ✓44 Dan McLaughlin
 ✓45 Ralph Meyer
 ✓46 LeRoy Newell
 ✓47 Owen Nichols
 ✓48 Oscar Pederson
 ✓49 Lorraine Peterson
 ✓50 John Sammon
 ✓51 Melvin Schmidt
~~52 [Name]~~
 ✓53 Muriel Zechlin
 ✓54 Emil Dreker
 ✓55 Lorraine Cotler
 ✓56 Joe Sherin
 ✓57 Doug Swanson
 ✓58 Kathy Swanson
 ✓59 Lyle Brown

NAME

NAME

NAME

989 50. Laura Beckmann
990 51. Marvin Berg
991 52. Michelle Wolfe

964 26. ~~Joseph L. Goodman~~965 26. ~~Joseph L. Goodman~~966 28. ~~Joseph L. Goodman~~967 28. ~~Joseph L. Goodman~~968 29. ~~Joseph L. Goodman~~969 30. ~~Joseph L. Goodman~~970 31. ~~Joseph L. Goodman~~971 32. ~~Joseph L. Goodman~~972 33. ~~Joseph L. Goodman~~

973 34. Joseph L. Goodman -

974 35. Mary Lou Goodman -

975 36. William H. Lasser -

976 38. Judith E. Lasser -

977 39. Bea Berkovitz -

978 39. Gerald H. Nelson -

979 40. Jean M. Nelson -

980 41. Carl Gustafson -

981 42. V. T. Gustafson -

982 43. Jim O. Hennessey -

983 44. Ronnie M. Hennessey -

984 45. Robert (Henry) Holm -

985 46. Patricia Holmes -

986 47. Don Murray -

987 48. Kay Murray -

988 49. Pat Williamson -

940. Louis R. Cernjar -

941. Elsie A. Cernjar -

942. William Bolish -

943. Lawaina Bolish -

944. Al Shapiro -

945. Marilyn Shapiro -

946. Glen Brett -

947. Elsie Brett -

948. Leonard Ruzynski -

949. Holly Ruzynski -

950. John A. Erickson -

951. Dan Bernard -

952. Jim Cunningham -

953. Jay Gallagher -

954. Marge Gallagher -

955. Robert La Pitz -

956. John Maki (& Mrs.) -

957. Ted Schmidt -

958. Ceil Schmidt -

959. Dale C. Horner -

960. Vince Jones -

961. Joseph McGaffey -

962. Victor W. McKeown (& Mr.) -

963. E. Roger Schwartz -

NAME

964 26. Mr & Mrs Floyd Z
 965 26. Lila Mae Nelson
 966 28. Merlin Nelson
 967 28. Glen Larson
 968 28. Gordy Jensen
 969 30. Richard Leiev
 970 34. Thomas Palmer
 971 38. Emery Borgman
 172 38. James Vaux
 173 38. Joseph L Goodman
 174 38. Mary Lou Goodman
 175 38. William H Lasser
 976 38. Judith E Lasser
 177 38. Bea Berkovitz
 178 38. Gerald H. Nelson
 179 40. Jean M. Nelson
 180 42. Carl Gustafson
 181 42. K. T. Gustafson
 182 42. Vim O. Hennessey
 983 44. Ronnie M Hennessey
 184 44. Robert (Henry) Holm
 185 46. Patricia Holmes
 186 48. Don Murray
 187 48. Kay Murray
 188 48. Pat Williamson

~~135 Mary [unclear]~~
 136 Dr. S.H. Levitt
 137 Mrs. S.H. Levitt
 138 Scott Levitt
 139 John Walsh
 140 Dean Walsh
 141 Mary Jo Walsh
 142 Helene Walsh
 143 James Walsh
 144 Steven Carter
 145 Todd Jones
 146 Victor Coleman
 147 Mark Volpe
 148 Ellen Krart
 149 Rose Christianson
 150 Ron Starks
 151 James Orr
 152 Neil DeGroob
 153 Scott Lanier
 154 ~~Mark [unclear]~~
 155 Ricardo Solomon
 156 ~~Mark [unclear]~~
 157 Lizette Evans
 158 ~~Mark [unclear]~~
 159 ~~Mark [unclear]~~
 160 ~~Jim [unclear]~~
 161 ~~Tom [unclear]~~
 162 ~~Sam [unclear]~~
 163 Jeff True
 164 Bill Erhart
 165 Dolores Erhart
 166 Albrecht Erhart
 167 Dan Erhart
 168 Kathy Erhart
 169 Bob Stransky
 170 Vicky Stransky
 171 John Weis
 172 ~~John [unclear]~~
 173 Jens Christenson
 174 Staly Gentry
 175 Mike Foster
 176 Mary Ann Foster
 177 Dr. David O'Steen
 178 Darla St. Martin
 179 ~~John [unclear]~~
 180 Jerry Dibble
 181 Jim Hall
 182 Terry Durkin
 183 Buzz Danzel
 184 Bob Brunig
 185 Tony Bragg
 186 Dudley Olson
 187 Kathy Dibble
 188 Ron Ousky
 189 Gloria Davidson
 190 A. Davidson
 191 Bill Dolan
 192 Mia Myklebust
 193 Monica Shephard
 194 Patricia McCoy
 195 Michael Berndt
 196 Lloyd Busch
 197 Den Prehal
 198 Ken Ornberg - 1907
 199 Greg Milnar
 200 Scott Proshek - 1907
 201 Tony Baldwin
 202 Don Slusaeski
 203 Mike Twist
 204 Mike Lehn
 205 Maureen Warren
 206 Joe Dudley, Sr.
 207 Joe Dudley, Jr.
 208 Tom Ryback
 209 Bob Richards

NAME

989 50. Laura Beckmann
 990 51. Marvin Berg
 991 52. Michelle Wolfe

736. ✓ Robert Klobe
 737. ✓ John Simms
 738. ✓ Jean Tischleder
 739. ✓ John Skraba
 740. ✓ Ed Lane
 741. ✓ Patricia Orth
 742. ✓ Joe Molzahn
 743. ✓ Jim Robinson
 744. ✓ Mrs. Therese Cosgrove
 745. ✓ Mary Mullin
 746. ✓ C. Bernard Jacobs
 747. ✓ Irene Jacobs
 748. ✓ Gary Aschwege
 749. ✓ Julie Aschwege
 750. ✓ David Lundemo
 751. ✓ Mike Bolin
 752. ✓ Harold Theisen
 753. ✓ Marian Theisen
 754. ✓ John Linstroth
 755. ✓ Karen Melling
 756. ✓ Jan Ahlers
 757. ✓ Bruce Ahlers
 758. ✓ Paul Albrecht
 759. ✓ Jibby Maas
 760. ✓ Ken Maas
 761. ✓ John T. Conlan
 762. ✓ Victor Jude
 763. ✓ Ruth Jude
 764. ✓ Rita Van Houtte
 765. ✓ Sue Greenwood
 766. ✓ Harold Greenwood
 767. ✓ Gloria Sims
 768. ✓ Bruce Nawrocki
 769. ✓ Joanne Pendergast
 770. ✓ Donald Pendergast
 771. ✓ Kenneth Jensen
 772. ✓ John A. Smrekav
 773. ✓ Alice P. Shillock
 774. ✓ Bonita Hagedorn
 775. ✓ Rick Hagedorn
 776. ✓ John Kuharski
 777. ✓ Tom Matejcek
 778. ✓ Mary Matejcek
 779. ✓ Harry Elfstrand
 780. ✓ Diane Elfstrand
 781. ✓ Clem Groh
 782. ✓ Alice Groh
 783. ✓ Celia Byrne
 784. ✓ Dick Byrne
 785. ✓ Joyce Traxler
 786. ✓ Mrs. Carl Penkinger
 787. ✓ Carl Penkinger
 788. ✓ Evie Bezdichek
 789. ✓ Larry Meyer
 790. ✓ George Beer
 791. ✓ Donna Beer
 792. ✓ Tom Thornton
 793. ✓ LeRoy Preble
 794. ✓ Sandi Morris
 795. ✓ Glenn H. Anderson
 796. ✓ Katherine Bokoroy
 797. ✓ Esther Abramson
 798. ✓ Martha P. Hoekel
 799. ✓ Mary Ann Kuharski
 800. ✓ Alan Senander
 801. ~~Bob Senander~~
 802. ✓ Marion Gallagher
 803. ✓ Juanita M. Swartout
 804. ✓ Virginia Barrett
 805. ✓ Frank Barrett
 806. ✓ Dennis Dacey
 807. ✓ Jack Kollmer
 808. ✓ Robert W. Lannan
 886. ✓ Mrs. Marian Brisse
 887. ✓ Tim Getman
 888. ✓ Mary Getman
 889. ✓ Nic Meyers
 890. ✓ Kay Meyers
 891. ✓ Mrs. Gail Schwich
 892. ✓ Mr. Dave Weis
 893. ✓ Mrs. Janet Mulhern
 894. ✓ Dennis Leibold
 895. ✓ Barb Leibold
 896. ✓ Mrs. Karen Kelnhof
 897. ✓ Marion Biessel
 898. ✓ Bob Biessel
 899. ✓ Mary Henkels
 900. ✓ Ken Henkels
 901. ✓ Mrs. Bob Harens
 902. ✓ Richard Stubee
 903. ✓ Berniva Stubee
 904. ✓ Mike Harens
 905. ✓ Willy Von Holtum
 906. ✓ Norma Von Holtum
 907. ✓ Sharon Klosterman
 908. ✓ Pat Hartman
 909. ✓ Jim Cook
 910. ✓ Mary Cook
 911. ✓ Jeanett Roetzel
 912. ✓ Frank Roetzel
 913. ✓ Jane Molitor
 914. ✓ Bob Baumgartner
 915. ✓ Kathy Baumgartner
 916. ✓ Vern Hunt
 917. ✓ Sarah Hunt
 918. ✓ Larry Hokanson
 919. ✓ Willard Landreville
 920. ✓ Harold Haubrich
 921. ✓ Levin Vagle
 922. ✓ Ben Lutterman
 923. ✓ Ann Lutterman
 924. ✓ Gus King
 925. ✓ Sandy King
 926. ✓ Eunice Fernholz
 927. ✓ Merl Fernholz
 928. ✓ Joanne Knuttila
 929. ✓ Tom Henderson
 930. ✓ Linda Henderson
 931. ✓ Ernie Michon
 932. ✓ Betty Michon
 933. ✓ Mary Ann Burnside
 934. ✓ Cheryl Hiemenz
 935. ✓ Bob Colwell
 936. ✓ Rita Colwell
 937. ✓ Valerie Contlon
 938. ✓ Len Lindsley
 939. ✓ Judy Lindsley
 992. ✓ Ed Gamradt 30
 993. ✓ Gary Gustafson
 994. ✓ Ruth Holmgren
 995. ✓ Mrs. C.A. Peter
 996. ✓ Mrs. R. Morgall
 997. ✓ Mrs. G. Sauer
 998. ✓ Doug Sexton
 999. ✓ Chris Holmgren
 1000. ✓ Mary Weiss
 1001. ✓ Ed Weiss
 1002. ✓ Thomas Murphy
 1003. ✓ Rosemary Pille
 1004. ✓ Kathy Jo Brock
 1005. ✓ Jerry Soderber
 1006. ✓ Marlys Soderber
 1007. ✓ James E. Murr
 1008. ✓ Ron Betlach
 1009. ✓ Bill Hamm 241
 1010. ✓ Jim Wolvert
 1011. ✓ Mr. Edward Moe
 1012. ✓ Mrs. Edward Moe
 1013. ✓ William Dunnig
 1014. ✓ Francis Hoseh
 1015. ✓ Mrs. Francis H
 1016. ✓ Andrew Poliach
 1017. ✓ Robert Vogel
 1018. ✓ Mrs. Robert Vo
 1019. ✓ Richard Hennig
 1020. ✓ George Kadadek
 1021. ✓ Dr. Joseph Dup
 1022. ✓ Mrs. J. Dupon
 1023. ✓ Ralph Matudka
 1024. ✓ Jake Viller
 1025. ✓ Gretchen Mill
 1026. ✓ John L. Reibo
 1027. ✓ Brett Stangel
 1028. ✓ Mrs. Florence
 1029. ✓ Clifford Thor
 1030. ✓ Bernice Thors
 1031. ✓ Kathy Johnson
 1032. ✓ Roger Reinhar
 1033. ✓ Sandy Reinhar
 1034. ✓ Jerry Reinhar
 1035. ✓ Steven Reinha
 1036. ✓ Ed Stransky
 1037. ✓ Theresa Stran
 1038. ✓ Gordy Stransk
 1039. ✓ Gary Stransky
 1040. ✓ Carol Stransk

661. ✓Blake Francis
 662. -Jack Meskill
 663. -Gayle Meskill
 664. -Gerald Moriarity
 665. -Robert King
 666. ✓Bill Duffy
 667. ✓Karin Lind
 668. -Ed Matanich
 669. ✓George Hakala
 670. ✓Jack Whiting
 671. -Arnold Servaty
 672. -Kenneth Perala
 673. -Bill Kauppinen
 674. ✓Louis Falbo
 675. ✓Judy Doran
 676. -George Wallace
 677. -Brae Pattenn
 678. -Merl Williams
 679. ✓Bill Jokela
 680. ✓Gail Halverson
 681. -Pat McGuire
 682. ✓Margaret Lanctot
 683. ✓Dr. Thomas Clifford
 684. ✓Ruth Erickson
 685. ✓Pete Lubovich
 686. -Mrs. Stimac
 687. ✓John M. Lamb
 688. ✓Mitch Costley P.
 689. -William Mealey
 690. ✓Bernice Duhant
 691. ✓Rod Halunin
 692. ✓Hank Cram
 693. ✓Linda Cram
 694. -Dale LaRoquet
 695. ✓Shirley Baker
 696. -Bob Peterson
 697. ✓Joyce Gagne
 698. ✓Sheila Ballavance
 699. -Joe Wiesinger
 700. -Dale Pommerville
 701. ✓Casey Coban
 702. -Margaret Rimmer
 703. -Rose Ann Galinski
 704. ✓Wallie Johnson
 705. -Joan Voltz
 706. -Bob Mulvehill
 707. -Maureen McKasy
 708. ✓Dr. Marin J. Brown
 709. ✓James W. Hannan
 710. ✓Shirley Haeg
 711. ✓Mary Anne Frank
 712. ✓Steve Frank
 713. ✓Delores Delmonico
 714. ✓Darlene Gerber
 715. ✓Kathy Brown
 716. ✓Gary Bentler
 717. ✓Dorothy Bentler
 718. -Leo Paquette
 719. -Dick Taylor
 720. ✓Stella Cook
 721. -John G. Klobe
 722. -Charles Wederath
 723. ✓Mildred Bayerl
 724. -John M. Klobe
 725. ✓Florence Gallagher
 726. ✓John Holmquist
 727. -Lucille Klobe
 728. ✓Charles Grabowski
 729. ✓George T. Blake
 730. ✓Jim Klobe
 731. -Rosemary Wederath
 732. -Bick Taylor
 732. -Steve Klobe
 733. ✓Dorothy Grabowski
 734. ✓Linda Klobe
 735. ✓Delores Klobe
512. -Kenneth Tesh
 513. -Jan Streumans
 514. -I.O. Knelman
 515. -Elizabeth C. Linne
 516. -Eva McNeil
 517. -Norma McCay
 518. -Carl Pohlad
 519. -Paul LeFeBure
 520. -Robert Hartmann
 521. -Maxine B. Quinn
 522. -Helen DeRudder
 523. -Richard J. Swanson
 524. -Frances Dorr
 525. -Wm. C. Smith
 526. -Les C. Roholet
 527. -Doyle Rose
 528. -Sylvia Peitso
 529. -Robert M. Maki
 530. -Robert V. Maki
 531. -Joyce M. Maki
 532. -Dennis F. Myers
 533. -Connie D. Myers
 534. -Peter Bye
 535. -Elinor Palo
 536. -Paul Palo
 537. -James L. Saranpaa
 538. -Jim Lassi
 539. -John E. Karasti
 540. -R.C. Clusil
 541. -Patricia Clusil
 542. -Audy Clusil
 543. -Jim Clusil
 544. -Wencil Wedll
 545. -Alma Wedll
 546. -Patricia Lassi
 547. -Don Thostenson
 548. -Bev Thostenson
 549. -Eldo Nibuki
 550. -Harvey Salberg
 551. -Elaine Solberg
 552. -F. Cornelius
 553. -S.A. Hirstio
 554. -Carroll Clifford
 555. -Mary Poznanovic
 556. -Rose Clifford
 557. -Maxine Coldageth
 558. -Sue Larofsa
 559. -Juanita Richard
 560. -Jerry Richard
 561. -Marv Auduron
 562. -Don Verallino
 563. -R. N. Vacello
 564. -Sophie Tilurzi
 565. -Tom Spatts
 566. -Richard Mattson
 567. -Mary Ann Parischo
 568. -Joel Karle
 569. -Denton Karle
 570. -Murline Tahija
 571. -Larry Tahija
 572. -Lind Turner
 573. -Lorne Turner
 574. -Bena Ahlin
 575. -Jim Ahlin
 576. -Ruby Van Heumen
 577. -Edward Van Heumen
 578. -Sharon Morcom
 579. -Chuck Morcom
 580. -Elsie Sleed
 581. -Eldon Sleed
 582. -Pat Young
 583. -Mark Young
 584. -Bea Stadler
 585. -Abe Stadler
 586. -Bob Klingsporn
362. -Marc Smotherson
 363. -Kathleen M. William
 364. -Mr. Ken Bergman
 365. -LaVonne Harwood
 366. -Ed Mantonich
 367. -Judy Mantonich
 368. -Sheila Haeg
 369. -Gregory Haeg
 370. -Dave Schmit
 371. -Mary Schmit
 372. -Rita Ryan
 373. -John Ryan
 374. -Mr. David Rau Kelly
 375. -Mrs. David Rau Kelly
 376. -Penney Bernier
 377. -Chelly Anderson
 378. -Kay Baumgartner
 379. -Bill Plante
 380. -Beverly Knutson Pl
 381. -Linda Cran
 382. -Barry McKee
 383. -Art Posingies
 384. -David Blusten
 385. -Mary Schwinn
 386. -Dave Lafontaine
 387. -Cindy Libby
 -Karen Jones
 389. -Ron Bacigalupo
 390. -Mayor Richard Hump
 391. -Jim Schwinn
 392. -Bill Schreyer
 393. -Ed Gatas
 394. -Dolly Shraha
 395. -Nick Overby
 396. -Dorothy Rapacz
 397. -Chris Bahe
 398. -Phillip Byrne
 399. -Bernice M. Byrne
 400. -Delia Beoning
 401. -Terry Boman
 402. -Linda Piwnica
 403. -Steven Zewach
 404. -Bill Youngdahl
 405. -Loretta Youngdahl
 406. -Betty Wood
 407. -Bob Ripsin
 408. -Kathleen M. William
 409. -Terry Todd
 410. -Frank Spreitzer
 411. -Thomas Ribus
 412. -Mary Courteau
 413. -Fary Courteau
 414. -Marge Lubke
 415. -Millie Schmit
 416. -Richard Huizel
 417. -Henry F. Beaudoin
 418. -Donald P. Cashman
 419. -Thomas Foss
 420. -Marcella Moegar
 421. -Blanche O'Connor
 422. -Donald O. Davis
 423. -Norbert M. DeMorr
 424. -Ray Gustafson
 425. -Patricia Gustafso
 426. -James Setten
 427. -Edward Eppler
 428. -Gerald Szymanski
 429. -Gary Roberts
 430. -Helen Schmit
 431. -Don Lundeen
 432. -Grace Lundeen
 433. -John Waytas
 434. -Jeff Caldor
 435. -Ray Subialka

8 3 0 4 0 4 1 1 5 7 2

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAR 26 PM 1:22

FROM

Fred L. Gates
c/o 1014 Third Ave. So.
Mpls, Minn 55404

TO

Wm. C. Oldaker, Gen. Counsel
Fed. Election Commission
1325 K St. Northwest
Washington, D C 20463

CERTIFIED/RETURN RECEIPT REQ.

• Please Handle with Care



Hotel Remington

3rd AVE 10th To 11th STREET

MINNEAPOLIS 4 MINNESOTA

CERTIFIED

No. 83040411572

MAIL



RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAR 16 PM 1:43

REC
#609

ROBERT E. SHORT
President

The Leamington

1014 THIRD AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55404

370-1100
Area Code 612

March 12, 1979

Mr. William C. Oldaker,
Federal Election Commission,
1325 K Street N.W.
Washington D.C.

Dear Mr. Oldaker,

In answer to your letter of February 13, 1979, enclosed are answers pertinent to the issue.

In addition, enclosed are copies of the solicitation forms used by Hotel Employees, and the lists as submitted by the terminal managers.

This matter was delayed pending my return from vacation, Feb. 19 - March 9, 1979.

Sincerely,

Oscar H. Molomot
Oscar H. Molomot,
DIRECTOR OF ADVERTISING/PUBLIC RELATIONS

Enclosures

Oscar Molomot, Chairman
Employees of Bob Short
Companies Committee
2950 Dean Parkway
Minneapolis, MN 55416

3304011574
RECEIVED
GENERAL COUNSEL

79 MAR 16 P4:41

RE: MUR 812

Federal Election Commission -- March 12, 1979

Answers to Specific Questions

1. Three solicitation efforts or meetings involved myself. These included the explanation message related to Terminal Managers and Salesmen in the 17 Terminals of Birmingham, Al; Chicago, Il; Cleveland, Oh; Denver, Co; Des Moines, I.; Detroit, Mi; Duluth, MN; Kansas City, Mo; Milwaukee, Wi; Moline, Il; Montgomery, Al; Omaha, Ne; Opolika, Al; Rochester, Mn; St. Louis, Mo; St. Paul, MN and Toledo, Oh. The message over the Admiral-Merchants' Long Line followed the regular sales meeting of H. P. Traun, V.P., Sales, and took approximately 10 minutes for explanation. It was not a special conference call. The group numbered 42 men. Enclosed is the list of these individuals. The terminal managers served as the collectors of contributions, and forwarded the amounts to Mr. Traun who in turn deposited the amount in a newly opened account at the Third Northwestern National Bank, Minneapolis, MN, 55414.

Enclosed is the address of each terminal and the address therefor of the terminal managers.

All contact with road drivers was made after they were checked-out, and all other contact of terminal people during their coffee breaks.

The single message over the sales meeting was made on October 18, 1978, from the office of Mr. Traun. It was his meeting. I tagged on as a so-called guest with a message. That was not a out-of-the-ordinary procedure. The time was 9 a.m.

The meeting with the personnel of the Hble General Headquarters of the trucking company was held on October 18, 1978, during the 10 a.m. coffee break of the office staff. The meeting lasted about 10 minutes; it was held in the 2nd floor coffee-lunch room. Attendance was not mandatory. About 30 persons listened to my message and additional comments by Mr. Traun.

Two meetings were held with the employees of the Leanington Hotel. The first was held at 10:30 on October 19, 1978, the second at 3 p.m. that same day. This was done to handle two shifts of workers. The first meeting was attended by about 45-50 persons, and the second by about 30. Each meeting took about 15 minutes, with talks by myself. The employees were told that all contributions were voluntary, and each was given a "contributory" form. The various department heads were given additional forms for those personnel unable to attend the meetings. These department heads were: Keith Olsen, Director of Sales; Jim Bufton, Convention Manager; A. C. Gunderson, Director and L. H. Hansen, Assistant Director, Food & Beverage Services; Bill Quinn, Personnel Manager; Don Virden, Reservations Manager. The forms and monies from this group was turned in to me, in turn given to Mr. Traun for deposits.

The two hotel meetings were authorized by Mr. Larry Weisgram, General Manager of the Leanington Hotel. Address is 1014 Third Avenue So., Mpls, MN

83040411574

Page 2:

Federal Election Commission -- March 12, 1979

Answers to Specific Questions

The Hotel meetings were held in one of the Conference Rooms which at the time was not being used.

2. The department heads listed above were involved in the solicitation in that they explained the purpose of the advertisement and handed the contributory form to individuals who for one reason or another were not at the meetings. Their address is that of the Leamington Hotel.

In addition, as explained above, the various Terminal Managers also participated in the solicitation effort. They were the ultimate contact with the drivers and office staff in the various terminal cities.

3. Below is a list of all reimbursements which I received from the Short for Senate Committee of Volunteers. No monies or advice was received on behalf of the Employees of Bob Short Companies Committee.
 - a. \$244.92 : Three large blow-ups of diagrams by Tenichical
Reproduction Co., Minneapolis. (Oct. 26, 1978)
 - b. \$62.24 : One large blow-up, mounted of photo of Billy Martin
for State Fair Exhibit (Sept. 2, 1978) By Albinson, Mpls.
 - c. \$52.88 : One large blow-up, eac. of President Truman, President
Jefferson and Governor Floyd B. Olson. (Aug. 28, 1978)
By Albinson, Inc. Mpls.)
 - d. \$22.01 : Room Service for Press Conference at Radisson Hotel, Mpls.
(8/30, '78)

83040411578

Admiral-Merchants/Cole-Dixie --- Terminal Mgrs/Salesmen

BIRMINGHAM

Bob Resinger, Div Mgr.
John May, TM
Fred Sawyer, Sales

CHICAGO

Tim Quinn, TM
John Brandt, SM
Jim Skrodzki, Sales
Bob Short, Sales

CLEVELAND

John Kral, TM
Pat Sweeney, Sales
Buddy Lewis, Sales

DENVER

Bob Anderson, TM
Erv Ford, SM
Jim Maxfield, Sales

DES MOINES

Marv Riddle, TM
Gary Clothier, Sales

DETROIT

Doug Stepp, TM
Stan Bielak, Sales
Gerald Devine, Sales

DULUTH

John Maki, TM
Al Johnson, Sales

KANSAS CITY

Larry Prince, TM
Bill Sobotka, Sales
Jerry Hughes, Sales

MILWAUKEE

Dick Hurst, TM
Frank Kirschbraun, Sales
Gordon Pierce, Sales

MOLINE

Tom Watson, TM
Phil Engebretson, SM

MONTGOMERY

Howard Kircus, TM

OMAHA

Harry Polacek, TM
Jay Hipwell, Sales

OPELIKA

Cecil Sessions, TM/SM

ROCHESTER

Dan Bernard, TM
John Erickson, Sales

ST. LOUIS

Bill Fischer, TM
Lee Brummell, DOS
Earl Koenig, Sales
Robert Pencak, Sales

ST. PAUL

Clet Swan, TM
Bob LaPitz, Sales
Ted Schmidt, Sales
Jay Gallagher, Sales
Jim Cunningham, Sales

TOLEDO

Ed Light, TM

Q TERMINAL ADDRESSES

TERMINAL CODES

- | | |
|----|--|
| 1 | St. Paul- 2625 Territorial Road, 55114 |
| 2 | Des Moines-4041 E. 14th St. 50313 |
| 3 | Moline- 410 22nd St., 61215 |
| 4 | St. Louis-3621 Gratiot St. 63110 |
| 5 | Omaha-601 S. Saddle Creek Rd. 68106 |
| 6 | Kansas City-822 N. Bellefontaine St 64122 |
| 7 | Denver-5201 E. 58th Ave. 80222 |
| 8 | Chicago-5504 W. 47th St. 60638 |
| 9 | Toledo- 5148 Tractor Road 43612 |
| 10 | Cleveland -7854 Granger Road 44125 |
| 11 | Detroit- 6170 Toledo Ave. 48209 |
| 14 | Duluth-3006 West First St. 55806 |
| 16 | Rochester- 3530 Highway 63 So. 55901 |
| 17 | Milwaukee-1101 W. Layton 53221 |
| 18 | Opelika-701 West Point Highway 36801 |
| 21 | Birmingham-200 Sixth Ave. S.W. 35211 |
| 32 | Montgomery-3609 Lower Wetumpka Rd
36110 |

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(VICKIE L. HIGHMAN)

Vickie L. Highman
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount \$10 -- \$5 -- \$2 which I will give to my department head or Mr. Molomot

(Please Do This Today)

(VERN BIENFANG)

Vern Bienfang
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(BEVERLY GUNLAUGSON)

Beverly Gunlaugson
Name City of Residence

83040411577

(Please Do This Today)

(KEN FAIRCHILD)

I will contribute amount (\$10 -- 35 -- 52) which I will give to my department head or Mr. Molomot.

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

Mr. Molomot:

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- 52) which I will give to my department head or Mr. Molomot. (VINCE FARRELL)

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- 52) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(CORDELIA WHITNEY)

Name

City of Residence

33040411579

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 12.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(PAT BIENFANG)

Pat Bienfang Bishop
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 10.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(MARILYN SOLVIN)

Marilyn Solvin
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 10.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(LORRAINE SHANNON)

Lorraine Shannon
Name City of Residence

83040411579

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot.

(LIBBY RIDLER)

(Please Do This Today)

Libby Ridler Residence

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot.

(NORMAN HAMILTON)

(Please Do This Today)

Norman Hamilton Residence

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today) (AUDREY CADY)

Audrey Cady Residence

Name

City of Residence

33040411530

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (10 -- 05 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(ESTHER ZOET)

Esther Zoet
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (10 -- 05 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(IRENE HAMANN)

Irene Hamann
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (10 -- 05 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(GERRI NARDUCCI)

Gerri Narducci
Name City of Residence

33040411531

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5.00 (\$10 -- 05 -- 02) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(PEARL GUSTAVSON)

Pearl Gustavson, Mpls.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2 (\$10 -- 05 -- 02) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(VIRGIE UNGS)

Virgie Unga
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2.00 (\$10 -- 05 -- 02) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(EMILY DURAND)

Emily Durand
Name City of Residence

330401153

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute Husband gave (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(MARILYN WEISGRAM)

Marilyn Weisgram - MPLS
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 0 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

(JANE D. MERRIAM)

Jane D. Merriam MPLS
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 0 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(ADELINE NEHRING)

Adeline Nehring MPLS
Name City of Residence

33040411533

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (\$10 -- 35 -- 52) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(ANGELINE REID)

MPLS

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 5 (\$10 -- 35 -- 52) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(ESTHER SNAVELY)

MPLS

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (\$10 -- 35 -- 52) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

(SUE TVETER)

MPLS

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 2 - (210 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (210 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (210 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(RICHARD STAFFEE) *Indianapolis*

Richard D. Staffee
Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

(ARTHUR C. SMITH)

Arthur C. Smith
Name

City of Residence

4526 Centennial Ave. Maple

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

(B. H. SHARP)

B. H. Sharp
Name

City of Residence

83040111303

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2 (10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Rich Smith Mpls
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2 (10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

James J. Harrison MPLS.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2 (10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

William J. Harrison
Name City of Residence

83040411537

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (10) -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Geneva Silsby
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Tom Robinson Blaine
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Tom Robinson
Name City of Residence

33040111508

Sharon at Bob

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

PAID William E. Johnson
Name City of Residence
to pay

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot.

(Please Do This Today)

Daniel P. Addicks
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$1.00 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot.

(Please Do This Today)

William E. Johnson
Name City of Residence
to pay

33040411503

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10.00 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

1925 Washington (Please Do This Today)
221 Bland, Mm. 28434

David Wang Blaine
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

CHUI S. LEE

CHUI S. LEE MDLS
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

KAR C. LEE

KAR C. LEE MDLS
Name City of Residence

33040111500

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5 (310 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

NGAI S. MA

NGAI S. MA. MDLS.

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5 (310 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

MARTIN CHENG

MARTIN CHENG S MPLS

Name

City of Residence

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5 (310 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

RON HALL

Ron H. Hall

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 2.00 (\$10 -- 25 -- 50) which I will give to my department head or Mr. Molomot

(Please Do This Today)

RUBEN T. QUIZON

1510 Portland

Box #3

MP16

Name

City of Residence

Winn. 55464

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 3.00 (\$10 -- 25 -- 50) which I will give to my department head or Mr. Molomot

(Please Do This Today)

PEGGY WANG

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 4.00 (\$10 -- 25 -- 50) which I will give to my department head or Mr. Molomot

(Please Do This Today)

MARY JOHANNESON

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (310 -- 35 -- 32) which I will give to my department head or Mr. Molomot

(Please Do This Today) MANDY AREILLA

Mandy Areilla 684 E. Beardsley
Name City of Residence
Berkeley

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute 2 (310 -- 35 -- 32) which I will give to my department head or Mr. Molomot

(Please Do This Today) JOHNNY C.C. TONG

Johnny Chih-chin Tong
Name City of Residence
Los Angeles Room

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (310 -- 35 -- 32) which I will give to my department head or Mr. Molomot

(Please Do This Today)

CHANG CHA YU

Chang Cha Yu 1000
Name City of Residence
San Francisco

3040411593

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$2 (10 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

SUN KWAI LAM

Sun Kwai Lam
Name City of Residence

2400 Ave. ST. Louis Mo.

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1 (10 -- 05 -- 01) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

MICHAEL CHANG

Michael Chang
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 2 (10 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

PROSERT SAEKO

Prosert Saeke MPD
Name City of Residence

304041152

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute \$2.00 (10 -- 25 -- 50) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today) WING SANG CHEUNG

Wing Sang Cheung St Paul
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 10 (10 -- 25 -- 50) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

JOSEPH LORENZO

Joseph Lorenzo Muskegon
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute \$2.00 (10 -- 25 -- 50) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

HOA C. HA

Ho C Ha Muskegon
Name City of Residence

3304041159

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- 05 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

ORLANDO PANLILIO

Orlando Panlilio
Name City of Residence

632 - EAST 17th St

Appl 7 in. 5544

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- 05 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

Poo Sucko MRS
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- 05 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

JAN RENEE RUTH

J. Renee Ruth
Name City of Residence

I promise to not make my name in the paper

33040411596

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute \$1 (310 -- 35 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

C.W. WONG MPL-S.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute \$1 (310 -- 35 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

PL. Mendez MIND.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute \$2.00 (310 -- 35 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

CHUN KEUNG LAU ✓

Chun Keung Lau
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Mike Russell
Name Fridley City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

James L. ...
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- 32) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Mitzy Peterson
Name City of Residence

83040411508

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

SOPHALA NHEP

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

N.W. LAU

Name

City of Residence

83040411503

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- 05 -- 02) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

BEVERLY KRAEMER

8609 West River

Beverly Kraemer
Name City of Residence Park

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1. (\$10 -- 05 -- 02) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

BEVERLY WOS

B. Wos

Mpls.

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1. (\$10 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

A.T. Toledo, Jr.

A.T. Toledo Jr.
Name City of Residence

Whitaker Ave
632 East 17th Street
Mpls. Minn 55404

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

CHI M. TSUI

CHI M TSUI MPLS MN.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

M. A. TOLEDO

M. A. Toledo
Name City of Residence

630 East 17th Street
N. H. M. 55400

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

JENNIFER WANG

JENNIFER WANG
Name

City of Residence

33040411601

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 05 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

ALFREDO O. QUINZON

Alfredo O. Quizon
Name

City of Residence

6324 Humboldt Ave. N. Buckeye Center Minn.

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$10 -- 05 -- \$2 which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

PRONNY M. CORTES

PRONNY M. CORTES
Name

City of Residence

8304041160

Mr. Kolomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 - 35 -- \$2) which I will give
amount
to my department head or Mr. Kolomot.

(Please Do This Today)

James M. ...
Name Buckfield City of Residence

Mr. Kolomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 - 35 -- \$2) which I will give
Amount
to my department head or Mr. Kolomot.

(Please Do This Today)

Paul Overby
Name Paul Overby City of Residence Bloomington

Mr. Kolomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 - 35 -- \$2) which I will give
amount
to my department head or Mr. Kolomot.

(Please Do This Today)

MO - Oushagor
Name MO - Oushagor City of Residence Maple

33040411600

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today) (DEBORAH MILLBURN)

MIDDESBORO

Deborah Millburn
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(Ruth Meyer)

MIDDESBORO

Ruth Meyer
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What the Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(FERNANDO INIGUES)

MIDDESBORO

Fernando Inigues
Name City of Residence

3 9 0 4 0 4 1 1 6 0

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(JEANNE Hye WI)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

ELK RIVER, PA

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

PAIDLEADERS.

Name

City of Residence

3304041160

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

Thunderous Horse Rm
Patricia Holman
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute Amount (\$10 -- 35 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(James Carlson) Canyon Valley
James Carlson
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute amount (\$10 -- 35 -- \$2) which I will give to my department head or Mr. Molomot

(Please Do This Today)

(Esteban Ayala) Milwaukee
Esteban Ayala
Name City of Residence

3040411603

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today) (ROBERT M. SMITH) MINNEAPOLIS

Robert M. Smith
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today) New Brighton
MARGARET SEIBERLICH

Margaret Seiberlich
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- 35 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today) New Brighton
MARGARET SEIBERLICH

Margaret Seiberlich
Name City of Residence

33040411607

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

mpw
(LEONOR INIQUEZ ZAVALLA)
Leonor Iniquez Zavalla
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Sam Tims - mpw
Sam Tims
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

mpw
PAT STECKHAUS
PAT STECKHAUS
Name City of Residence

83040111608

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

JAYNE STRAUFFER

mples

Name

City of Residence

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Bonnie Peterson - Fridley

Name

City of Residence

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- \$5 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Lloyd Flynn

33040111600

Mr. Kolomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute \$10 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Kolomot.

(Please Do This Today)

Bob Short
Name

Minneapolis
City of Residence

Mr. Kolomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute \$10 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Kolomot.

(Please Do This Today)

Carrie Pratt
Name

Minneapolis
City of Residence

Mr. Kolomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute \$10 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Kolomot.

(Please Do This Today)

Leona McDonald
Name

Minneapolis
City of Residence

33040411610

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Minneapolis

Richard R. Larson

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Minneapolis

George R. Larson

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 2.00 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Minneapolis

Diane K. Larson

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 25 -- 50) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 25 -- 50) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 25 -- 50) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (\$10 -- 05 -- 32) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Mr. Molomot;

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 1.50 (\$10 -- 05 -- 02) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5.00 (\$10 -- ~~\$35~~ -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Donald Williams Rich

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5.00 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

1001 KIDEN MRIS

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5 (\$10 -- \$5 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

M. Sutton Armand
Name City of Residence

MRIS

6304041161

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 2.00 (\$10 -- 35 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Robert D. Davis
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- 35 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Robert D. Davis
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 1.00 (\$10 -- 35 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

James Ross Brooklyn Center
Name City of Residence

3 2 0 4 0 1 1 6 1 3

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 1 (10 -- 5 -- 2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Francis W. Short W. H. Short
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 5 (10 -- 5 -- 2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

James H. Short W. H. Short
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What Do Employees of Bob Short Think of Him."

I will contribute 5 (10 -- 5 -- 2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Douglas Y. Samuel W. H. Short
Name City of Residence

33040111616

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 20.00 (\$10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

PAUL J. LEMIEUX

Paul Lemieux
Name

Bloomington
City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 10 (\$10 -- 35 -- 52) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Frank A. Bon
Name

41.1 1st St
St Louis Park
City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes, in the advertisement telling the public "What We Employes of Bob Short Think of Him."

I will contribute 10 (\$10 -- 35 -- 52) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Charles E. Bon
Name

St Louis Park
City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 55 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Barbara K. Jones 55412
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 55 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Barbara K. Jones 55412
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5.00 (\$10 -- 55 -- \$2) which I will give
Amount
to my department head or Mr. Molomot.

(Please Do This Today)

Barbara K. Jones 55412
Name City of Residence

83040411618

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute (10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

IMAR ANZANELLO

MP/S

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

Rec'd
I will contribute 20.00 (10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Jim B. (Mann) - MI

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

DA
I will contribute 20.00 (10 -- 35 -- 32) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Robert J. Casey
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (\$10 -- 05 -- \$2) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

William Linn Mcl.
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 5 (\$10 -- 05 -- \$2) which I will give
Amount
to my department head or Mr. Molomot

(Please Do This Today)

Joe Thompson
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute 10 (\$10 -- 05 -- \$2) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Lester M. Hines
Name City of Residence

83040411610

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$10 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$7 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employees, in the advertisement telling the public "What We Employees of Bob Short Think of Him."

I will contribute \$5 (\$10 -- \$5 -- \$2) which I will give to my department head or Mr. Molomot.

(Please Do This Today)

Name

City of Residence

St 101-7

ending _____

Terminal Wages - Worksh

EMPLOYEES NAME

Clatus L. Sa
 Carl P. Halting
 Gary Miller
 Harry Severs
 Frank Brown
 Dennis Miller
 Alan Shapiro
 Jim Vane
 Maden R. Nelson
 Gordy Jensen
 W. E. Hauge
 Russ STEWART
 Tom H. Smith
 Robert Jensen
 Barney E. Taylor
 E. C. Shuckman
 Wm. J. Thompson
 Peter E. Halush
 Paul S. Springer
 Joe Davidson
 Melvin Edson
 Henry H. Hine
 Carl E. Han
 Myrtle H. Hines
 Stewart A. Hines
 Thomas J. Steen
 Ralph K. Glad

Sat.	Total
	Mpls. Minn.
	impl. Minn.
	ST. Paul
	New Brighton
	Forest Hill
	St. Paul
	Hpls
	New Brighton
	Rosville Minn
	Col. Htse
	impl. Minn
	Mpls
	impl. Minn
	Rosville Minn
	Forest Hill
	impl. Minn
	St. Paul
	St. Paul
	col. B. H. Hines
	ST. PAUL
	Mpls. Minn
	Forest Hill
	impl. Minn
	impl. Minn
	impl. Minn
	Mpls.

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ding

St.	Total
Rosville, Mo.	
Mpls.	
Mpls.	
Black River Falls	
Winnipeg, Minn.	
Stacy, Minn.	
St Paul Minn.	
White Bear Lake	
Quincy, Minn.	
St. Paul	
Black River Falls, Minn.	
Scandia, Minn.	
St Paul Minn.	
St Paul	
Andover, Minn.	
Mpls.	
St Paul	
St Paul	
St. Paul	
Mpls.	
Mpls.	
Mpls.	
St Paul	
ST PAUL	
144	

Terminal Wages - Worksheet

BYEES NAME

Phil Brunell T.P.
 Eugene T. ^{Nussmeier} ✓
 Gordon ^{Danred} T.P. ✓
 John ^{aman} Wadagnon ✓
 Bonnie Nigam
 Norman Hangel
 Helen ^{Rogness} Kestice
 Jack Whitehead
 Ray Holiaghe
 B. C. Erickson
 Jerry Holaback
^{an} Fred ~~Hansen~~ ✓
~~John~~ ^{an} ~~Larson~~ ✓
 James ^{an} ~~Clark~~ ✓
 Frank ~~Whitney~~
 Paul ~~Bart~~ T.P.
 L. Erickson
 Evert Peterson

o-r-T.

inding

Sat.	Total
	St Paul
	St Paul
	Hastings Minn
	Wyn. Park
	Paul
	St. Paul Ben. 2
	Centon Mo
	Centon Mo
	St. Paul
	Mpls
	Mpls
	St Paul
	St Paul
	Mpls
	Kaukaia
	Fridley Min
	Rochester Min
	Mpls Min

丁

iding _____

EMPLOYEES NAME	
Dave DiSanto	
Robert K. Smith	
Ted S. Smith	
Harold W. Del	
- Pat Anderson	
David N. H. Brown	TP
- William C. Brown	TP
Tom M. H. Smith	
W. H. E. Smith	
David F. Smith	
- Tom H. Smith	
Thomas PALMER	
Mike Byrnes	
Jerry K. Smith	
George Hill	
Robert (Henry) H. Smith	
- W. C. Smith	
Edward H. Smith	
Joseph C. Smith	

at,	Total
Rosville, Mo.	
Mpls	
Mpls.	
Black Pine Falls	
Newburgh, N.Y.	
Mpls, Minn	
Jacks Minn.	
Stacy, Minn.	
St Paul Minn	
White Bear Lake	
Nassau Mills	
No. ST. PAUL	
Blue Pine Falls, Minn.	
Lonsdale	
St Paul Minn.	
St Paul	
Cum Ripton	
Friedles Minn.	

NAME	City of Residence
Oding Nelson	St Paul
Oscar Melmet	Mpls
H. A. Trauer	"
Joseph P. O'Leary	Mpls
Karen M. O'Leary	Mpls
Glenn E. Smith	Mpls
Howie R. Conner	Bloomington
Virginia Klesner	Mpls
Chas M. Curtis	St. Paul
Bill Brish	East. Butte
Karl Tersch	White Bear Lake
Ken Delin	Cal. Hts
John Ennet	Arden Hills
Carol Nicholas	Mpls
Helle Musgrave	Brooklyn Center
Eugene A. Rice	Mpls
BEV ERICKSON	COON RAPIDS
Bob Lishie	Champlin
Bonnie Baxter	Mpls

EMPLOYEE NAME	W A G E S						Total
	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.	
Cletus L. Swan 20						Impl. Min.	
Edith Malmgren 20						Impl. Min.	
Gary Miller						ST. Paul	
Helen Swanson 10 ⁰⁰						New Brighton	
Phyllis Peterson						Forest 44	
Dennis Miller						St. Paul	
Alan Shapiro 10 ⁰⁰						Impl.	
Jim Vane						New Brighton	
Madeline R. Nelson						Rosville Min.	
Barry Jensen 17						Coh. Ht.	
W. E. Wright Jr. TP						Impl. Min.	
Russ STEWART TP						MPLS	
Tom M. M. 20						Impl. Min.	
Robert Jensen 25						Rosville Min.	
Barney E. Smith 20						Centerville	
W. C. M. 20						Centerville	
W. C. M. 20						Centerville	
Orville Gehlen						Centerville	
Bonnie Romane Hudson WI 5 ⁰⁰ (TP)						Hudson 1-2-3	

DES MOINES TERMINAL --- Ad for Short

- | | |
|----------------------|--------------------|
| 1. Marv Riddle | Des Moines, Iowa |
| 2. Robert Resinger | Newton, Iowa |
| 3. Gary Clothier | Des Moines, Iowa |
| 4. Marvin Nye | Des Moines, Iowa |
| 5. Ed Hall | Ankeny, Iowa |
| 6. Mike Mihalovich | Des Moines, Iowa |
| 7. Virginia Remsburg | Des Moines, Iowa |
| 8. Carl Eggermont | Des Moines, Iowa |
| 9. Floyd Rhoades | Indianola, Iowa |
| 10. Harry Redman | Michellville, Iowa |
| 11. Dean Proudfoot | New Virginia, Iowa |
| 12. Willard Nelson | Des Moines, Iowa |

TO

Additional from Des Moines -- Money in mail Wed

- | | |
|-------------------|----------------------|
| 13. Merle Davis | Des Moines, Iowa |
| 14. Dick Vaughn | Des Moines, Iowa |
| 15. Cal Kanis | Des Moines, Iowa |
| 16. Jack Coburn | Dallas, Center, Iowa |
| 17. Cliff Houge | Des Moines, Iowa |
| 18. Mike Driscoll | Des Moines, Iowa |

5 - Hpls

SUBJECT Contributors For the Short Ad

Marvin Middle -	Des Moines, Iowa
Robert Asinger	Des Moines
Dave Clithier	Des Moines
Marvin Ego	Des Moines
Ed Hall	Des Moines, Iowa
Mike Lindelovien	Des Moines
Virginia Casbury	Des Moines
Carl Asperant	Des Moines
Floyd Rhodes	Indianola, Iowa
Harry Asman	Mitchellville, Iowa
Dean Broadfoot	New Virginia, Iowa
W. Nelson	Des Moines

Jack Osburn	Dallas Center, Iowa
Cliff Hauge	Des Moines
Mike Briscoll	Des Moines
Carl Wells	Des Moines
Dick Austin	Des Moines
Carl Wells	Des Moines

SIGNATURE _____

REPLY: _____

DATE _____

RETURN THIS COPY TO _____

33040411625

MOLINE TERMINAL..

1. Tom Watson	Eldridge IA
2. Phil Engebretson	Rock Island IL
3. Barbara Chafin	Moline IL
4. Joan De Muynck	East Moline IL
5. Keith Queck	Rock Island IL
6. William Seeman	Long Grove IA
7. William Fakas	Moline IL
8. Gilbert Mallinger	Davenport IA
9. William Rogers	Moline IL

+ 5 10/26

83040411530

ST. LOUIS TERMINAL

1. Herman Chambers	Belleville IL
2. Sam Di Marco	Overland MO
3. Leo Dowling	St Louis MO
4. Kiefer Evans	St Louis MO
5. Ben Forsyth	Granite City IL
6. Jack Keener	Granite City IL
7. Wm. Spinks	Godfrey IL
8. Cal Jenkins	Arnold MO
9. Dennis Pruitt	Dittmer MO
10. George Harper	St Louis MO
11. J C Moore	East St Louis MO
12. N E Holden	Luarel MS
13. C W Roberts	Mt Olive AL
14. Ray McGinness	Granite City IL
15. Paul McGinness	Granite City IL
16. Eugene Lemke	Florissant MO
17. Floyd Lael	Jennings MO
18. Gil Adams	Florissant MO
19. Gus Pantagis	East St Louis MO
20. Dryil Luter	St Louis MO
21. William Ratliff	St Louis MO
22. John Fox	St Louis MO
23. Gene Baker	Bonne Terre MO
24. Denver Hassell	House Sps MO
25. Noah Williams	St Louis MO
26. Bob Davis	De Soto MO
27. Rich Grain	St Louis MO
28. Harold Johnson	Flat River MO
29. Nick Randazzo	St Louis MO
30. Kenny Wich	St Louis MO
31. Darlene Ferguson	St Louis MO
32. Charles Schroer	Kirkwood MO
33. Merle Nettles	St Louis MO
34. Grace Floyd	St Louis MO
35. Dorothy Shearer	Belleville IL
36. Bill Fischer	Lake Sherwood MO
37. Lee Brummell	Glendale MO
38. Earl Koenig	St Louis MO
39. Robert Pencak	Belleville IL
40. Mike Waller	Maryland Heights MO
41. L. Hendrickson	Salina KS
42. Leo Flarity	Salina KS
43. Richard Armstrong	Minneapolis KS

33040411651

August 9, 1978

- Union*
- ~~XXXXXXXXXXXX~~
1. Herman Chambers 7/31/47 116 Lakeland Blvd. Belleville, Illinois 62221 ~~XXXXXX~~
 2. Sam Di Marco 4/12/48 10215 Midland Overland, Mo. 63114 ~~XXXXXX~~
 3. Leo Dowling 3/9/49 6412 Vermont St. Louis, Mo. 63111 ~~XXXXXX~~
 4. Kiefer Evans 9/29/49 3438a Iowa St. St. Louis, Mo. 63118 ~~XXXXXX~~
 5. Ben Forsyth 1/7/52 3124 Rodger Avenue Granite City, Illinois 62040 ~~XXXXXX~~
 6. Jack Keener 5/7/52 3217 Colgate Granite City, Illinois 62040 ~~XXXXXX~~
 7. *W.* W. Spinks 7/24/61 5202 Williams St. Godfrey, Illinois 62035 ~~XXXXXX~~
 8. Cal Jenkins 3/9/65 2274 Cessna Arnold, Missouri 63010 ~~XXXXXX~~
 9. Dennis Pruitt 8/19/65 RR#2 Dittmer, Missouri 63023 ~~XXXXXX~~
 10. ~~Edward Terry~~ 4/29/74 1420 La Salle St. Louis, Missouri ~~XXXXXX~~

George H. Harker

St Louis Mo

350-400

Emmer

August 9, 1978

ST. LOUIS BID COLE DIXIE ST. LOUIS TO BIRMINGHAM, ALA.

1. J. C. Moore 5/2/50 5800 New Missouri Ave.
East St. Louis, Illinois [REDACTED]
2. N. E. Holden 2/24/51 Rt. 4 Box 472 Laurel, Miss. 39440 [REDACTED]
3. C. W. Roberts 10/9/51 P O Box 263 Mt. Olive, Ala. 35117 [REDACTED]

ST. LOUIS GARAGE

Ray R. Mc Ginness 7/21/70 2605 Washington Granite City, Illinois
62040 [REDACTED]

Paul P. Mc Ginness 3/15/77 R R # 2 Box 910 Y Granite City, Illinois
62040 [REDACTED]

~~R. Thomas~~ 4/3/78 2429 E. 25th Granite City, Illinois
62040 [REDACTED]

3304041

August 9, 1978

~~CONFIDENTIAL~~ LIST

1. Eugene Lemke 9/11/49 115 Duquette Florissant, Mo. 63033
(on Leave to Local 600)
2. Floyd Lael 7/27/50 5641 Sapphire Jennings, Mo. 63136
3. Gil Adams 5/15/62 840 Paddock Dr. Florissant, Missouri
63033
4. Gus Pantagis 4/24/63 114 Edwards East St. Louis, Illinois
62206
5. Cyril Luter 4/26/64 165 E. Etta St. Louis, Missouri 63125
6. William Ratliff 10/20/64 3819 Wisconsin St. Louis, Mo. 63118
7. John Fox 3/8/65 6246 Marmaduke St. Louis, Mo. 63139
8. Gene Baker 3/8/65 RR 2 Box 235 Bonne Terre, Mo. 63628
9. Denver Hassell 8/28/65 Rt. 5 5318 Rainbow Dr. House Sps. Mo.
63051
- ~~10. ~~Robert~~ 3/27/67 403 Fire Tree Lane O'Fallon, Mo. 63366~~
11. ^{Nick} N. Williams 5/15/67 3920 Juniata St. Louis, Mo. 63116
12. ^{Bob} B. Davis 7/18/68 1511 Lindenwood De. Soto, Mo. 63020
13. ^{Rick} R. Crain 5/31/76 156 Cahokia St. St. Louis, Mo. 63118
14. ^{Harold} H. Johnson 2/10/78 224 S. Davis St. Flat River, Mo. 63601
15. ^{Nick} B. Randazzo 6/29/78 5515 Janet St. Louis, Missouri 63136

Kenny K. H. 10/14
H. H.

ST. Louis 11/6

August 9, 1978

ST. LOUIS SALARIED PERSONNEL - Company

Bill Fischer Terminal Manager
Box 71 Lake Sherwood, Missouri 63357 [REDACTED]

Lee Brunnell Sales Manager
716 Belvedere Glendale, Missouri 63122 [REDACTED]

Earl Koenig Salesman
5810 Flaming Leaf Ct. St. Louis, Missouri
63129 [REDACTED]

Robert Pencak Salesman
6509 Old St. Louis Road
Belleville, Illinois 62223 [REDACTED]

Mike Waller Dock Foreman
12046 Providence Maryland Heights, Mo. 63043 [REDACTED]

~~Terry Rehagen~~ ~~Dock Foreman~~
~~5655 Chalet Forest Dr. St. Louis, Missouri~~ [REDACTED]

Local Business - Union

L. Hendrickson - Salina Kan

Leo Flarty - Salina Kan.

Richard Armstrong - Salina Kan
Minneapolis

August 9, 1978

*all
fines*

~~Derious Ferguson~~ Interline and City Cashier 3/13/52
1000 Foxlair Ct. St. Louis, Missouri 63137

Charles Schroer Rate Clerk 5/22/53
627 Nirk Avenue Kirkwood, Missouri 63122

Merle Nettles Payroll-Secretary 6/28/54
4165 Grasso Ave. St. Louis, Missouri 63123

6
at ~~Grass-Floyd~~ Tracing-OSD 10/6/54
Mike Floyd 710 Loughborough St. Louis, Missouri 63111

H. ~~Ray-Jones, Jr.~~ Rate Clerk 3/21/54
626 Rosetta Drive Florissant, Missouri 63031

3 Dorothy Shearer Billing and Manifesting 8/21/65
604 Springdale Drive Belleville, Illinois
62223

~~Tom Nowak~~ Billing and Manifesting 3/13/69
914 Jacobs Lane O'Fallon, Missouri

~~Martha Wissler~~ Billing and Manifesting 6/1/77
4671 Alaska St. Louis, Missouri 63111

~~Jean Bock~~ General Office 6/2/77
10310 Vicount Drive St. Louis, Missouri 63136

OMAHA TERMINAL ---- Ad for Short

1. Albert Bekaert Omaha, Nebraska
2. Richard Anderson Omaha, Nebraska
3. Harry Polacek Omaha, Nebraska
4. Jay Hipwell Omaha, Nebraska
5. Donald Ackerman Council Bluffs, Iowa
6. John Agnew Omaha, Nebraska
7. Robert Kuhse Omaha, Nebraska
8. James Dutcher Omaha, Nebraska
9. Clarice Burright Omaha, Nebraska
10. Arvilla Mellis Omaha, Nebraska
11. Ron Tilley Council Bluffs, Iowa
12. Roger Nixon Omaha NE
13. Russel Holderness Omaha NE
14. George Hovey Omaha, Nebraska
15. Bill Girth Columbus NE

33040-111637

Oct. 20, 1978

Hap Traun

Fmt Harry Polacek - Omaha

Hap:

Listed below are Omaha contributors to the campaign ad for Mr. Short .

Attached please find cash and checks donated. Some of these people will submit their money to me Monday (10/23) and will forward to you at that time.

Albert Eekaert *

Richard Anderson *

Harry Polacek

Jay Hipwell

Donald Ackerman *

John Agnew

Robert Kuhse

James Dutcher *

Clarice Burright

Arvilla Nellis

Ron Tilley *

Roger Nixon *

Russell Holderness +

George Hovey +

KANSAS CITY TERMINAL ----- Contributic

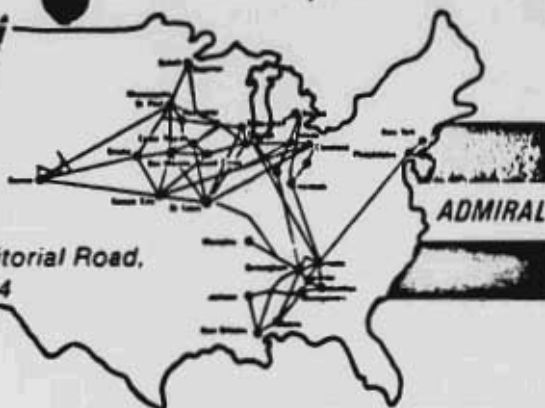
- 33040411613
- | | |
|----------------------|------------------------|
| 1. Larry Prince | Independence, Mi |
| 2. Jerry Hughes | Raytown, Missouri |
| 3. Bill Sobotka | Independence, Missouri |
| 4. Florine Campos | Kansas City, Kansas |
| 5. Jack Baccus | Kansas City, Missouri |
| 6. Fred Cannon | Peculiar, Missouri |
| 7. Hubert Burge | Holt, Missouri |
| 8. Edward Cosgrove | Kansas City, Missouri |
| 9. Donald Hough | Parkville, Missouri |
| 10. Joseph Sayer | Kansas City, Missouri |
| 11. Billy Corbett | Kansas City, Kansas |
| 12. Vodra Shull | Kansas City, Missouri |
| 13. Fred Sebol | Independence, Missouri |
| 14. Vernon Peterson | Jasper, Missouri |
| 15. John Wilcutt | Independence, Missouri |
| 16. Kenneth Langseth | Kansas City, Missouri |
| 17. Preston Wade | Raytown, Missouri |
| 18. Terry Sullivan | Blue Springs, Missouri |
| 19. W. E. Taylor | Raytown, Missouri |
| 20. Michael Bell | Overland Park, Kansas |

TOTAL

Larry is mailing money in today.
10/24/78



General Offices: 2625 Territorial Road,
St. Paul, Minnesota 55114



TO: H. A. TRAUN

SUBJECT: MR. SHORTS CAMPAIGN

LISTED BELOW ARE THE NAMES OF THE EMPLOYEES AT
LISTED ACROSS FROM THEIR NAME IS THE AMOUNT OF
CHECK IS ATTACHED COVERING THE TOTAL CONTRIBUTI

LARRY L. PRINCE
STEVE WILSON
BILL SOBOTKA
JERRY HUGHES

FLORINE CAMPOS
JACK BACCUS
FRED CANNON
HUBERT BURGE
EDWARD COSGROVE
DONALD HOUGH
JOSEPH SAYER
BILLY CORBETT
VODRA SHULL
FRED SEBOL
VERNON PETERSON
JOHN WILCUTT

KEN LANGSETH
PRESTON WADE
TERRY SULLIVAN
W. E. TAYLOR
MICHAEL BELL

TOTAL CONTRIBUTIONS

Hap..

For Bob Short's campaign fund

R. V. Anderson	Denver	Colo
- Erv Ford	Arvada	"
Jim Maxfield	Denver	"
- Jeanne Garlach	"	"
Evelyn Ginther	Wheatridge	Colo
* Francis Bagley	Wheatridge	Colo
John Rider	Denver	"
* Jake Garcia	"	"
* Joe Barba	"	"
* Joe Madrid	"	"
* Lou Marques	"	"
* Ken McNecken	"	"
* Leroy Wilcox	Wheatridge	Colo
* Dave Whitmore	Wheatridge	Colo
	Total	129.0

Bob A. Del

33040411611

CHICAGO TERMINAL

1. Tim Quinn	Chicago IL	20
2. Jim Skrodzki	Northbrook IL	20
3. Elaine Beuke	Chicago IL	20
4. Jack Corr	Chicago IL	20
5. John Brandt	Lombard IL	20
6. Robert C Short	Roselle IL	20
7. Pat Fitzgerald	Oak Park IL	20
8. Frank Coleman	Chicago IL	20
9. Joe Green	Chicago IL	7
10. Herman Rosen	Des Plaines IL	10
11. Mary DeBleyzer	Chicago IL	25
12. Mary Caron	Oaklawn IL	10
13. Aurora Scaramella	Oak Forest IL	10
14. Earl Berg	Brookfield IL	25
15. Willie Buckner	Chicago IL	10
16. Joseph Downs	Chicago IL	10
17. John Plaza	Summit IL	10
18. A. Bandola	Chicago IL	10
19. Richard Witczak	Chicago IL	10
20. Al Radefeld	Chicago IL	20
21. George Borovac	Chicago IL	10
22. Tom Brdar	Crestwood IL 1	10
23. George Kroll	Burbank IL	10
24. Joe Pontrelli	Berwyn IL	10
25. John Graves	Chicago IL	10
26. Thomas Higgins	Chicago IL	10
27. Fred Solleder	Chicago IL	10
28. LeRoy Sanders	Chicago IL	10
29. Roy Caldwell	Chicago IL	10
30. Charles Burch	Chicago IL	10
31. Bill Barb	Countryside IL	20
32. Rich Craven	Chicago IL	50
33. Ben Mells	Chicago IL	20

33040411511

CHICAGO TERMINAL NON-UNION EMPLOYEES

1. Jim Skrodzki 10/1/48
2. Elaine Beuke 2/27/56
3. Jack Corr 9/14/59
4. John Brandt 10/3/61
5. Robert Short 2/15/65
6. Tim Quinn 9/6/65
7. Pat Fitzgerald 12/9/68
~~8. Thomas Luye 5/2/77~~
8 FRANK COLEMAN 7/25/77

10/1/78
~~12/28/77~~

33040411610

4920
CHICAGO TERMINAL OFFICE SENIORITY LIST

1. Joseph Green	11/30/50
2. Herman Rosen	11/22/54
3. Mary DeBleyzer	6/7/55
4. Mary Caron	2/11/57
5. Aurora Scaramella	4/8/57

8304041164
~~12/23/77~~
10/1/78

"Changes f

CHICAGO TERMINAL CITY DRIVER SENIORITY LIST

1. Emil Vahr	7/3/57
2. James Stevens	11/17/55
3. Tom Erdar	2/16/56
4. George Kroll	8/3/59
5. Andy Buikema	10/6/43
6. Frank Bertman	11/23/50
7. Ed Jurgovan	10/14/52
8. Joe Pontrelli	4/12/56
9. Richard Mattioli	10/20/56
10. George Walls	7/31/73
11. James Taylor	8/13/73
12. Jerome Sullivan	9/14/73
13. Richard Stallone	5/20/74
14. Orlando Petrucci	8/4/75
15. John Graves	5/3/75
16. Richard Kish	5/10/75
17. David Horrell	4/12/77
18. Thomas Higgins	6/27/77
18. FRED SOLLEDER	3-2-78
19. LEROY SANDERS	3-2-78

10/1/78
~~12/25/77~~

83040411613

Copy

CHICAGO TERMINAL DOCK SENIORITY LIST

1. Len Szafranski	7/29/50
2. Al Szafranski	9/13/50
3. Jack Thomas	4/2/51
4. Carl Denton	6/25/51
5. John Kozisek	7/16/51
6. Joe Kwiatkowski	11/5/51
7. Charles Johnson	6/15/53
8. Robert Maguire	9/14/53
9. Richard Witczak	10/19/53
10. Al Radefeld	10/31/55
11. Anton Lipka	12/14/72
12. George Borovac	10/27/75
13. Robert Stanko	1/26/76
14. John Lique	5/10/76

~~12/28/77~~

10/1/78

8304011616

CHICAGO TERMINAL GARAGE VENDOR

1. Earl Berg
2. Willie Buckner
3. John Gruenwald
4. Ewald Plenius
5. Joseph Downs
6. Thomas Bafia
7. John Plazyn
8. A. Bandala

10/1/78
~~12/29/77~~

83040411617

Roy Caldwell

Charles Burch

Richard Craven

Bill Barb

Ben Mells

33040411618

CLEVELAND TERMINAL

1. John Kral	Homerville OH
2. Pat Sweeney	Avon Lake OH
3. Buddy Lewis	Willoughby OH
4. Marilyn Becker	Parma OH
5. Alice Lucek	Cleveland OH
6. Dave Rininger	Windham OH
7. Bob Tomsik	Parma Heights OH
8. George Dixon	Hinckley OH
9. Lionel Hartill	Cleveland OH
10. Tom Ausmus	Burbank OH

TOTAL

83040411619

DETROIT TERMINAL ---- Ad for Short

- | | |
|--------------------|----------------------------|
| 1. Doug Stepp | Canton, Michigan |
| 2. Red Mailloux | Windsor, Ontario, Canada |
| 3. Stan Bielak | South Lyon, Michigan |
| 4. Leona Zajac | Detroit, Michigan |
| 5. Allene Sanford | Melvindale, Michigan |
| 6. Gerald DeVine | Ecorse, Michigan |
| 7. Ray Wilson | Lincoln Park, Michigan |
| 8. Alex Demiter | Inkster, Michigan |
| 9. Sam Stolber | Detroit, Michigan |
| 10. Clare Ansman | Dearborn Heights, Michigan |
| 11. Fred Mendoza | Livonia, Michigan |
| 12. Joe Bova | Lincoln Park, Michigan |
| 13. Brady Mullins | Woodhaven, Michigan |
| 14. Ernie Alcoccer | Inkster, Michigan |
| 15. Roy Vela | Dearborn Heights, Michigan |
| 16. Al Czerniak | Dearborn, Michigan |
| 17. Edsel Blake | Dearborn, Michigan |
| 18. Fred Lang | Lincoln Park, Michigan |
| 19. Doyle Thomas | Detroit, Michigan |
| 20. John Blakely | Detroit, Michigan |
| 21. Bill Holland | Detroit, Michigan |
| 22. Larry O'Connor | Detroit, Michigan |

33040411653

TOLEDO TERMINAL

1. Ed Light	Lambertville MI
2. John Hones	Lemoyne OH
3. Jill Stute	Toledo OH
4. Robert Johnston	Toledo OH
5. George Snyder	Toledo OH
6. Russell Varwig	Toledo OH
7. Donavon Tarry	Erie MI

TOTAL

03040411651

3
0
4
0
4
1
1
0
3

each employee given

Victor L. McKeown, 2424 34th St., Lincoln, Mo. 64601
 Roger L. Smith, 1512 Horton St., Lincoln, Mo. 64601
 Joseph C. McCreary, 3211 S. Main St., Lincoln, Mo. 64601
 Dale E. Jones, 1201 S. Central Entrance, Lincoln, Mo. 64603
 Dr. Roy B. Johnson, 7701 S. Lincoln Hwy. Mo., Lincoln, Mo. 64601

Medicare - in d. and d. section

Vince Jones, 3732 W. 2nd St., Lincoln, Mo. 64607

SIGNATURE

Office

REPLY:

Barbara L. Smith, 3330 W. 2nd St., Lincoln, Mo. 64606
 Alfred Johnson, 1401 S. 1st, Lincoln, Mo. 64606
 John Maki, 1401 S. 1st, Lincoln, Mo. 64606

Total.

MILWAUKEE TERMINAL

- | | |
|----------------------|---------------|
| 1. Dick Hurst | Shorewood WI |
| 2. Robert Moran | West Allis WI |
| 3. Ruth Mitchell | West Allis WI |
| 4. Frank Kirschbraun | West Allis WI |
| 5. Bob Kirshner | Milwaukee WI |
| 6. Bob Brockway | Oak Creek WI |
| 7. Ervin Kujawa | Milwaukee WI |
| 8. Leland Tripp | Muskego WI |
| 9. Donald Behncks | Milwaukee WI |
| 10. John Poznanski | Milwaukee WI |
| 11. Vern Arnold | Milwaukee WI |
| 12. Gordon Pierce | Milwaukee WI |

33040111653

OPELIKA TERMINAL

- | | |
|--------------------|----------------|
| 1. C J Sessions | Columbus GA |
| 2. Madeline Morris | Phenix City AL |
| 3. Tullis Goodson | Opelika AL |
| 4. R L Luther | Columbus GA |
| 5. Sebron Smith | Opelika AL |

BIRMINGHAM

- | | |
|------------------|------------|
| 1. Paul Robinson | Tarrant AL |
|------------------|------------|

33040111633

TO: H A Traun - Mpls

☐ ADMIRAL MER

☒ JACK COLE D

JECT: _____ DATE: 10

The following employees have contributed to the ad for Mr. Sho

John E May, Jr.	Midfield, Al.
~ Fred W. Sawyer	Hoover, Al.
Christine Lee	Birmingham, Al.
~ Edna Townes	Tarrant, Al.
John S Smith	Mt. Olive, Al.
~ David L. Moorer	Birmingham, Al.
~ Dock Patton Sr.	Birmingham, Al.
~ Loel Rogers	Birmingham, Al.
~ Warren G. Hollis	Birmingham, Al.
~ Melvin E. Thomas	Birmingham, Al.
~ Robert Tarpley	Tarrant, Al.
~ Leonard Cork	Dora, Al.
~ Tom Graves	Mt. Olive, Al.
~ Bob Rose	Birmingham, Al.

MONTGOMERY, ALABAMA TERMINAL --- Ad for :

- | | |
|------------------|---------------------|
| 1. Howard Kircus | Montgomery, Alabama |
| 2. Mike Hill | Montgomery AL |
| 3. S. Chancey | Montgomery AL |

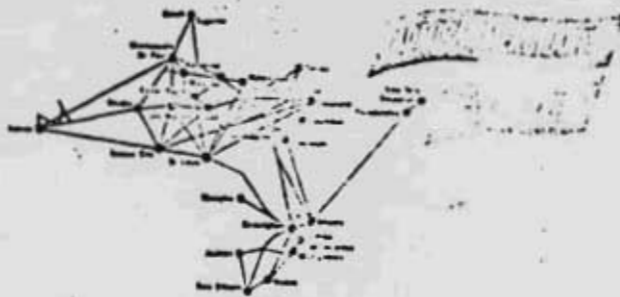
TOTAL

33040411657

ST. PAUL SPECIAL COMMODITIES

- | | |
|----------------------|------------------|
| 1. Carl Holmgren | St. Paul MN |
| 2. Frank Morisset | Little Canada MN |
| 3. O. Summers | Baldwin WI |
| 4. Gail Rutledge | New Richmond WI |
| 5. Marshall Dresel | Eau Claire WI |
| 6. Kirk Wytttenbach | South St Paul MN |
| 7. Floyd Goodloe | Chicago IL |
| 8. Dave Reese | Osseo WI |
| 9. Robert Donaldson | New Auburn WI |
| 10. Steven Donaldson | New Auburn WI |
| 11. Robert Blevens | Janesville WI |

83040411558



**DIRECT
SERVICE TO**

ALA.	MICH.
COLO.	MINN.
GA.	MISS.
ILL.	MO.
IO.	NEBR.
KAN.	OHIO
LA.	WISC.

SPECIAL COMMODITIES DIV. HESSVILLE, INDIANA
P.O. BOX 2278

IN HESSVILLE PHONE
IN CHICAGO PHONE

219-845-2803
312-374-6161

H&F
Hessville Office

Tom Setz

Denver, Colo

- LORNA Knotts

Volcano, Ind

MAE Maxwell

Ho Let.

- Winston Demuth

Crete, Ill

KAREN Slade

Newport, Ind

- Bennie Dye

"

Gladys Barwick

Columbet City, Ill

- DAWN Spisak

Hammond, Ind

DIANE Dwyer

"

- Terri Fields

Lake Station "

83040411633

FROM

Oscar H. Holzer
Employees of Bob Short
Companies Committee
2950 Dean Parkway,
Chgo. Ill 60616

TO

Mr. William C. Aldaker,
Federal Election Commission
1325 K Street, N.W.
Washington D.C. 20463

FEDERAL
COMMISSION

8 3 0 4 0 4 1 1 6 6 0

79 MAR 16 PM 1:43

CERTIFIED

No.

MAIL



St. Paul Dispatch St. Paul Pioneer Press

RECEIVED
FEDERAL ELECTION
COMMISSION

600#
950

55 EAST FOURTH STREET ST. PAUL, MINNESOTA 55101

79 MAR 12 PM 2:50
812-272-3014

50220

March 7, 1979

Ms. Suzanne Callahan
Staff Member
Federal Election Committee
1325 K Street, NW
Washington, D. C. 20463

Re: MUR 812

Dear Ms. Callahan:

This letter is in reply to a subpoena issued Mr. Bernard H. Ridder, President, St. Paul Dispatch & Pioneer Press, 55 East Fourth Street, St. Paul, MN 55101, in the matter of 'Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee'. The answers to the twelve questions submitted, are as follows.

1. Francis E. Spiess, Credit Manager, St. Paul Dispatch & Pioneer Press, 55 East Fourth Street, St. Paul, MN 55101.
2. The committee did make the expenditures listed, with one minor difference. We received the \$1,611.90 payment on 10/30/78, rather than 10/28/78 and we received the \$2,310.46 payment on 11/3/78, rather than 11/2/78, as listed.
3. Display advertising space in the St. Paul Dispatch and Pioneer Press, St. Paul Saturday Pioneer Press and St. Paul Sunday Pioneer Press. See attached invoices.
4. To the best of our recollection, we were contacted either on 10/24/78 or 10/25/78.
5. A male person (we are unable to recall his name) telephoned us indicating that he was doing some public relations work for the committee, known as The DFL Common Sense Committee.
6. Harold Larsen, Advertising Sales Representative.

Ms. Suzanne Callahan
Staff Member
Federal Election Committee
125 K Street, NW
Washington, D. C. 20463

Page 2 Re: MUR 812

March 7, 1979

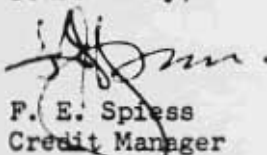
7. No. He indicated that he was not sure how much advertising they would be doing, however, he requested information regarding various sizes of advertisements, deadlines and other related information.
8. Yes. The same individual phoned us again indicating the sizes of advertisements they wished to run, and based on the cost information provided in the previous conversation, he confirmed what the charges for the advertisements would be. This conversation took place on Thursday, 10/26/78 or Friday, 10/27/78. The amount quoted was \$1,611.90.
9. No
10. We were given authority to insert the advertisement that appeared on 10/30/78 the previous Friday, 10/27/78. The other two expenditures in question, the authority was given on Thursday, 11/2/78.

A contract covering the advertising for the committee was signed by Mr. Donald Wozniak. The copy of this contract is enclosed.

11. Day of Publication.
12. The terms of payment were payment in advance.

If I can be of any further assistance, please feel free to contact me.

Yours truly,


F. E. Spiess
Credit Manager

FES/gc

Enclosure

cc: T. Carlin
Publisher

Ms. Suzanne Callahan
Staff Member
Federal Election Committee
1325 K Street, NW
Washington, D. C. 20463

Page 3 Re: MUR 812

March 7, 1979

I, Francis E. Spiess, do hereby swear the statements made on the preceding pages are true and correct to the best of my knowledge.

Francis E. Spiess
Credit Manager, St. Paul Dispatch & Pioneer Press

Subscribed and sworn to before me this 7th day of March, 1979.

Marilyn G. Johnson
Notary Public

Ramsey County, Minnesota

My commission expires October 1, 1980.



3304041163

5982

401 MIDWEST FEDERAL
ST PAUL MN 55101

NOV 30 1978

St. Paul Dispatch
St. Paul Pioneer Press

NORTHWEST PUBLICATIONS, INC.

Publisher
55 East Fourth Street
St. Paul, Minn. 55101
222-5011

TYPE OF CONTRACT

3.750 LINE ANNUAL BILL
FULL CIRCULATION

CONTRACT NUMBER

7903
OCT 26 1979

INSERTION NUMBER	CAPTION OR DESCRIPTION	DATE	PUBLICATION	LINES	RATE	AMOUNT
23325	WHO ARE PEOPLE	WED 11/01	DISPATCH	980	.9400	921.20
26981	STAR TRIB BOYS	FRI 11/03	PIONEER	980	.6950	681.10
27528	NOTE SHORT & DF	SAT 11/04	PIONEER	980	1.8300	1803.40
27538	DO YOU OWE DAVE	SUN 11/05	PIONEER	1260	1.1400	1436.40
27539	GALLOT DFL	MON 11/06	DISPATCH	980	.9400	921.20

LINEAGE BILLED THIS STATEMENT PERIOD

FULL CIRCULATION LINEAGE

PIONEER PRESS	DISPATCH	SUNDAY	SATURDAY
980	1960	1260	980

AREA LINEAGE

NORTH	SOUTH	EAST	WEST	DATE

DISPLAY CHARGES THIS PERIOD

5263.30

PER ATTACHED BILL

TOTAL (PAY THIS AMOUNT)

Invoices rendered for the period shown are calculated at the advertiser's contract rate. These rates are subject to review at the end of the contract period to the rate earned based on performance according to the rate card.

ALL ACCOUNTS ARE DUE 15th OF THE MONTH FOLLOWING SERVICE. 2% cash discount may be taken provided payment in full is postmarked by the 10th of the month and there are no arrearages.

DFL COMMON SENSE COMMITTEE
POLITICAL
401 MIDWEST FEDERAL
ST PAUL MN 55101

STATEMENT DATE
NOV 30 1978
CONTRACT NUMBER
7903

DISPLAY CHARGES
5263.30
TOTAL CHARGES

304041163

FORM NO 56 REV 5-71

PRINTED BY THE STANDARD ELECTRIC COMPANY U.S.A.

RECEIVED
FEDERAL ELECTION
COMMISSION

1. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?

#1 no

2. Did you or any other signators of the advertisement or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.

#2 see other side

3. Did Mr. Short or any of his authorized agents offer any suggestions in regard to your groups activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.

#3 no

4. Were any of the signators of the advertisement involved in prior activity on behalf of Mr. Short? If so, please identify who was so engaged, in what capacity, and on what dates. ("prior campaign activity" includes paid staff, volunteers, consultants or any activity whatever on behalf of Mr. Short)

#4 see other side

5. In your response of January 22, you state that the signators of the ad agreed by consensus to place an advertisement in the Catholic Bulletin. In this regard;

Who originated the idea of placing an advertisement on behalf of Robert Short? *Leo Titser Jr. proposed it was the consensus of the signators to place the ad*

In what manner were the signators of the advertisement solicited for contributions to pay for the advertisement? Who collected the funds? *primarily by phone or personal contact, contributions received by Leo Titser Jr. and forwarded to me or come directly to me*
In what manner were the contributions received? (i.e., cash or check) *both cash & check*

Who designed the layout for the advertisement?

Leo Titser Jr.

Who contacted the Catholic Bulletin regarding the placing of the advertisement?

Leo Titser Jr.

Who finalized the agreement with the Catholic Bulletin to run the advertisement? *to comply with Minnesota statute dealing with political ads in newspapers, ad was placed at a flat rate*
If any individual or group other than the signators of the advertisement made contributions, please indicate.

There were no contributions from any group or political action committee - they were individual contributions under the signators of the ad

83040411666

00110

#2 As political party officers or being politically active; I'm sure the signatories of this ad discussed campaign activities and corresponded with authorized agents of candidates, or candidates including Mr Short. I would have no idea of the number, nature or substance of contacts between the signatories and Mr Short or any other candidate. As an individual I did not correspond or contact U.S. Senator Short before, during, or after his campaign for Senator in 1978.

#4 (see response to #2) at various times Mr Short has been a candidate for Congress, Governor of Minnesota, for the U.S. Senate, even the Party nominee for Lt. Governor for the State of Minnesota, organized and coordinated many political campaigns and has been active for many years in the Democratic Party - holding many political offices including being Treasurer of the National Democratic Party. I believe the phrase "any activities whatever on behalf of Mr Short" would include large numbers of Democrats. There is no way I could begin to answer this question.

Dear Mr Callahan, I hope these responses will clarify: our placing this newspaper ad. I was not able to contact all of the signatories so answered to the best of my knowledge.

Sincerely,

Karen Powers
735 E. Co Rd B.
St Paul MN 55117

REC-830 40411657
GENERAL COUNCIL

19 MAR 14 P4:16

6. The Publisher may require cash payment in advance of advertising at any time he deems the financial condition of the Advertiser is not satisfactory. The Publisher may terminate this agreement at any time the Advertiser fails to pay for the advertising when due or otherwise violates this agreement.

7. All advertising under the terms of this contract must be for the Advertiser's business exclusively. This contract is not assignable by the Advertiser.

8. The Publisher assumes no responsibility for publication of advertising in the event of flood, fire, natural disaster, riot, human error, strike or other labor disturbance, or other cause, whether of like character or not, beyond the control of the Publisher. Errors or omissions by the Publisher will not be considered grounds for cancellation of this contract. The Publisher reserves the right to limit advertising due to mechanical or space limitations.

9. All advertising is subject to the approval of the Publisher. The Publisher reserves the right to insert the word "Advertisement" above any advertisement at the Advertiser's expense.

10. The Publisher shall not be liable to the Advertiser for any claims except those specifically covered on this contract. The Advertiser agrees to defend and indemnify the Publisher against liabilities or claims asserted or established against the Publisher as a result of any advertisement published at the request of the Advertiser.

11. The Publisher assumes responsibility for errors in advertisements only if errors clearly marked by the Advertiser on proofs returned to the newspaper within deadline requirements are not corrected. The Publisher's liability for such errors is limited to republishing or crediting the cost of that portion of the advertisement in error as the Publisher shall elect.

DFL COMMON SENSE
COMMITTEE

By [Signature] (Advertiser)
Title Chairman
Address 481 Midwest Federal
City ST Paul State Minn Zip 55101
Phone 227-9494

St. Paul Dispatch & Pioneer Press
(Northwest Publications, Inc., Publisher)

Harold Laran
Sales Representative

This contract shall be effective when approved by the Publisher's Advertising Director or Display Advertising Manager.

Approved [Signature]

D. D. Wozniak Chairman

St. Paul Dispatch
St. Paul Pioneer Press

13 E. FOURTH STREET
ST. PAUL, MINNESOTA 55101

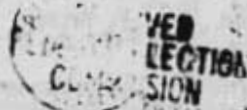
CERTIFIED

No. 402662

MAIL

RETURN RECEIPT REQUESTED

Ms. Suzanne Callahan
Staff Member
Federal Election Committee
1325 K Street, NW
Washington, D. C. 20463



'79 MAY 1 AM 2:50

REMAIN
ADVERTISING CONTRACT

BETWEEN

ST. PAUL DISPATCH & PIONEER PRESS
(Northwest Publications, Inc., Publisher)

AND

**DFL Common Sense
Committee**

(called the Advertiser)

DATE 10/27/78

In consideration of the Advertiser's agreement to buy from the Publisher not less than

3750

BA

~~750~~

of Line 11

— advertising during a period of one year from the date of this contract, the Publisher agrees with the Advertiser to furnish advertising under the following conditions.

1. The rates and conditions for advertising under this contract shall be those shown on the Publisher's current rate card. The rate card, its revisions and successors shall be a part of this contract.

2. This contract shall be effective for one year from its date shown above. It shall be automatically renewed annually for another year on each expiration date unless either party gives written notice of termination prior to the end of any contract year.

3. If the Advertiser has used enough advertising at the end of the contract year to qualify him for a lower rate, as shown on the applicable rate card, he will be entitled to a rebate from the Publisher based on a recomputation of the advertising during the contract year at the lower rate.

4. If the Advertiser has used less advertising at the end of the contract year than is called for by this contract, he will pay the Publisher for advertising used during the contract year at the earned rate as shown on the applicable rate card, and this contract shall be automatically terminated.

5. Rates and conditions under this contract are subject to revision by the Publisher at any time. The Publisher agrees to give the Advertiser at least thirty(30) days written notice of such change. In the event of such notice, the Advertiser may cancel this contract on the effective date of such change by prior written notice to the Publisher without liability for unused advertising and without a rebilling at a higher rate. If the Advertiser does not so cancel this contract, the new rates and conditions shall be a part of this contract.

3. County Rel B.
Paul Mm 55117



3 3 0 4
RECEIVED
FEDERAL ELECTION
COMMISSION

79 MAR 14 PM 2:45

Federal Election Commission
1325 K Street N.W.
Washington D.C. 20463
att. Mrs. Suzanne Callahan

THE MINNEAPOLIS STAR
Evening

RECEIVED
FEDERAL ELECTION
COMMISSION
MINNEAPOLIS TRIBUNE
Morning and Sunday

79 MAR 12 PM 3:13

MARY JOAN BERG
ATTORNEY

Minneapolis, Minnesota 55488

March 7, 1979

William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street North West
Washington, D.C. 20463

Re: MUR 812

Dear Mr. Oldaker:

This will acknowledge that the Commission's order to submit written answers and subpoena to produce documents were received by Mr. Otto A. Silha, President of the Minneapolis Star and Tribune Company, on Thursday, March 1, 1979.

Mr. Silha's affidavit in answer to the Commission's questions is enclosed.

Also enclosed, pursuant to the subpoena, are photocopies of the documents listed below. These documents are all the business records in the possession of the Minneapolis Star and Tribune Company pertaining to financial transactions in 1978 between this Company and the "Just a Bunch of Plain Folks Who Want Common Sense Government" Committee.

1. General advertising order forms for ads replaced by the Committee on October 26, 27, and 30, and November 1 and 2, 1978.
2. Advertising insertion orders for ads placed by the Committee, for ads scheduled to run October 29 and 31, and November 2, 4, and 6, 1978. The insertion order for the ad scheduled to run November 5, 1978, is no longer in the possession of the Minneapolis Star and Tribune Company. The ad is referenced on the general advertising order form dated November 2, 1978.

3304041167

William C. Oldaker
March 7, 1979
Page 2

3. Display advertising invoice forms documenting amounts billed the Committee in 1978 by the Minneapolis Star and Tribune Company.

If you have further questions, please feel free to call me at (612) 372-4111.

Very truly yours,

Mary Joan Berg

Mary Joan Berg

MJB/dmi
Enclosures

cc: Otto A. Silha

8304041157

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Just a Bunch of Plain DFL)	Affidavit of
Folks Who Want Common)	Otto A. Silha
Sense Government Committee)	MUR 812

Otto A. Silha, having first been duly sworn, deposes and states to the best of his knowledge and belief:

1. That his name is Otto A. Silha and that he holds the position of President of the Minneapolis Star and Tribune Company, 425 Portland Avenue, Minneapolis, Minnesota 55488.
2. That the "Just a Bunch of Plain DFL Folks Who Want Common Sense Government" Committee made expenditures for display advertising as follows: \$2,833.18, paid by check October 26, 1978; \$1,747.93, paid by check October 27, 1978; \$1,210.00, paid by check October 30, 1978; \$2,084.07, paid by check November 1, 1978, and \$5,390.59, paid by check November 2, 1978.
3. That display advertising space was provided for these expenditures.
4. That the Advertising Department of the Minneapolis Star and Tribune Company was first contacted by an agent of the Committee with reference to providing display advertising space on or about October 26, 1978.
5. That the Advertising Department of the Minneapolis Star and Tribune Company was contacted on behalf of the Committee by William O. Cooley.
6. That William H. Gray, a Minneapolis Star and Tribune Company advertising department account representative, acted on behalf of the Minneapolis Star and Tribune Company in accepting and scheduling the display advertising space.
7. That in initial negotiations, the representative of the Committee did not specify an amount of money he wished to spend, nor did he specify the quantity of advertising he wished to purchase.
8. That the Committee was provided with an estimate as to the cost of the advertising space desired. The estimate was provided at the time advertising space was ordered. Estimates were made as follows: \$2,833.18 on October 26, 1978, for advertising scheduled to run in the Sunday Tribune October 29, 1978; \$1,747.93 on October 27, 1978, for advertising scheduled to run in The Minneapolis Star Tuesday, October 31, 1978; \$1,210.00 on October 30, 1978, for advertising scheduled to run in the Minneapolis Tribune Thursday, November 2, 1978; \$2,084.07 on November 1, 1978, for advertising scheduled to run Saturday, November 4, 1978, and \$5,390.59 on November 2, 1978, for advertising scheduled to run in the Minneapolis Tribune on Sunday, November 5 and in The Minneapolis Star on Monday, November 6, 1978.

9 MAR 12 PM 4:36

9. That the Minneapolis Star and Tribune Company did not provide design and layout of the ads.
10. That authority to begin printing was given on the date the advertising order was placed, specifically: October 26, 1978 for advertising scheduled to appear Sunday, October 29; October 27, 1978, for advertising scheduled to appear Tuesday, October 31; October 30, 1978, for advertising scheduled to appear Thursday, November 2; November 1, 1978, for advertising scheduled to appear Saturday, November 4, and November 2, 1978, for advertising scheduled to appear Sunday, November 5 and Monday, November 6.
11. That printing began as follows: October 28, 1978, for the Sunday Tribune, October 29, 1978; October 31, 1978, for The Minneapolis Star, October 31, 1978; November 1, 1978, for the Minneapolis Tribune, November 2, 1978; November 3, 1978, for Saturday, November 4, 1978; November 4, 1978, for the Sunday Tribune, November 5, 1978, and November 6, 1978, for The Minneapolis Star, November 6, 1978.
12. That payment terms were payment in advance.

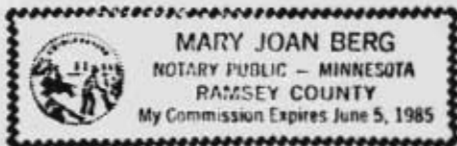
Dated this 8th day of March, 1979.



Otto A. Silha
President
Minneapolis Star and Tribune Company

Subscribed and sworn to before me
this 8th day of March, 1979.

Mary Joan Berg
Notary Public



THE MINNEAPOLIS
STAR

DISPLAY ADVERTISING INVOICE

P.O. BOX 15095 • MINNEAPOLIS, MINN. 55488

Minneapolis
Tribune

DEL COMMON SENSE COMM
401 MIDWEST FEDERAL BLDG
ST PAUL MN 55101

JF

INVOICE DATE | PAGE

10-31-78 | 1

ACCOUNT NO.

N 26697-26697

REFER TO

NO	DATE DAY	PAPER CODE	DESCRIPTION	SPACE	RATE	AMOUNT
	10-31		PAYME 2,833.18		57.2	2,833.18
	10-31		PAYME 1,747.93		35.7	1,747.93
	10-20	3	POLITICAL ADV	GRD	2.95	2,895.00
	10-31	2	POLITICAL ADV	GRD	1.82	1,783.00

1 Morning 3 Sunday 5 Color Comics
2 Evening 4 Pict. Mag. 6 TV Week

7. NOTED

SUBJECT TO EARNED DISCOUNT

ACCOUNT ANALYSIS

CURRENT	OVER 30 DAYS	OVER 60 DAYS	OVER 90 DAYS

REMIT TOTAL BALANCE DUE
UNLESS PAID BY 11-15-78

AGENCY COMMISSION	2% CASH DISCOUNT ON CURRENT CHARGES	BALANCE LESS DISCOUNT

83040411676

RECEIVED 10/31/78 ST PAUL MINN 55104 • PHONE 812-445-3081



DISPLAY ADVERTISING INVOICE

P.O. BOX 15095 • MINNEAPOLIS, MINN. 55488

Minneapolis
TribuneDFL COMMON SENSE COMM
401 MIDWEST FEDERAL BLDG
ST PAUL MN 55101

INVOICE DATE | PAGE

11-30-78 | 1

ACCOUNT NO.

N 26697-26697

JF

REFER TO

MO	DATE	PAPER	DESCRIPTION	SPACE	RATE	AMOUNT
	DAY	CODE				
11-01			PAYME 1,210.10		24.70	1,234.80
11-03			PAYME 2,084.07		42.53	2,126.60
11-07			PAYME 5,390.59		110.01	5,500.60
11-02	1		POLITICAL ADV	980	1.25	1,234.80
11-04	7		POLITICAL ADV	980	2.17	2,126.60
11-05	3		POLITICAL ADV	1260	2.95	3,717.00
11-06	2		POLITICAL ADV	980	1.82	1,783.60

1 Morning 3 Sunday 5 Color Comics
2 Evening 4 Pict. Mag. 6 Tv. News

7. SATURDAY

SUBJECT TO EARNED DISCOUNT

ACCOUNT ANALYSIS

CURRENT	OVER 30 DAYS	OVER 60 DAYS	OVER 90 DAYS	
				\$.00

REMIT TOTAL BALANCE DUE
UNLESS PAID BY 12-15-78

AGENCY COMMISSION	2% CASH DISCOUNT ON CURRENT CHARGES	BALANCE LESS DISCOUNT
		\$.00

back MW 253318

DATE _____
ADVERTISER DFL Common Sense Comm

STREET 401 Midwest Federal Bldg

QTY St Paul 55101

PRODUCT Political

POSITION 1st news - far forward

☐ General *Political*
☐ Local Auto
☐ Retail
☐ Retail (flat) tie in
☐ Special Position Paid
☐ Co-op Rate
☐ Hotel & Resort Rate
☐ Memo Billing
☐ Color Charge
☐ Blind Box Number

COLOR _____

STAR ZONES	1	2	3	4	5	TRIB ZONES	N	S
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

SUNDAY TRIBUNE **METRO** **COUNTRY**

COUPON

ORDERED BY _____

SCHEDULE

[illegible]

**COPY # OR CAPTION OR
REPEAT # AND DATE**

PRINTING MATERIAL

☒ Herewith
☐ To Come
☐ You Have

MISCELLANEOUS INSTRUCTIONS

MISCELLANEOUS INSTRUCTIONS £/5 to above
address

DATE _____

10-27-78

ADVERTISER

DFL Common Sense Comm

AGENCY

STREET

401 Midwest Federal Bldg

QTY

St Paul 55/01

PRODUCT

Political

POSITION

V, st news

RATE INSTRUCTIONS

- ☐ General *Politics*
☐ Local Auto
☐ Retail
☐ Retail (flat) tie in
☐ Special Position Paid
☐ Co-op Rate
☐ Hotel & Resort Rate
☐ Memo Billing
☐ Color Charge
☐ Blind Box Number

COLOR

STAR ZONES

1

2

3

4

S

TRIB
ZONES

N

S

METRO

COUNTRY

SUNDAY TRIBUNE**COUPON**

ORDERED BY

UF

OK H/W

SCHEDULE

[illegible]

1421-NF

PRINTING MATERIAL

- ☐ Herewith
☒ To Come
☐ You Have

10/30
AM 13/01

MISCELLANEOUS INSTRUCTIONS

GEN. 119

● GENERAL ADVERTISING

Chuck Hwth 1,210.00

DATE 10-30-78

DATE 11-15-19
ADVERTISER DFL Common Sense Committee

AGENCY 401 Midwest Federal Bldg

STREET

QTY

PRODUCT

POSITION Main News. (Close to front

as possible.)

COLOR

STAR ZONES

1

2

3

4

S

TRIB ZONES

N

S

METRO

COUNTRY

SUNDAY TRIBUNE

COUPON

ORDERED BY

SCHEDULE

TRIBUNE		STAR		SIZE	COPY # OR CAPTION OR REPEAT # AND DATE
DAY	DATE	DAY	DATE		
Thurs	11-2			5X4 146	Thurs 11-2
					\$1210.10
					check here
					1449-JF

PRINTING MATERIAL

- ☐ Herewith
☐ To Come
☐ You Have

MISCELLANEOUS INSTRUCTIONS

OCT 30 1978

THE MINNEAPOLIS STAR AND TRIBUNE COMPANY

DATE _____

ADVERTISER**AGENCY**

STREET

CITY

PRODUCT**POSITION**

COLOR

STAR ZONES

1

2

3

1

3

**TRIB
ZONE**

1

29

SUNDAY TRIBUNE

METRO

COUNTRY

ORDERED BY

SCHEDULE

[illegible]

PRINTING MATERIAL

- ☐ Herewith
☒ To Come
☐ You Have

11/2.
Delivered
to Betty Gray

MISCELLANEOUS INSTRUCTIONS

t/s to above

GEN. 119

GENERAL ADVERTISING

#5,390.59
N2 10697 10697

DATE 11-2-78

ADVERTISER DFL Common Sense Gov Comm

AGENCY

STREET 401 Midwest Federal Bldg.

CITY St Paul

PRODUCT Political

POSITION 1st news for forward

RATE INSTRUCTIONS

- ☐ General Political
- ☐ Local Auto
- ☐ Retail
- ☐ Retail (flat) tie in
- ☐ Special Position Paid
- ☐ Co-op Rate
- ☐ Hotel & Resort Rate
- ☐ Memo Billing
- ☐ Color Charge
- ☐ Blind Box Number

COLOR

STAR ZONES 1 2 3 4 5 TRIB ZONES N S

METRO

COUNTRY

SUNDAY TRIBUNE

COUPON

ORDERED BY J F

CK HW 5,390.59

CK H/W
NO CK HW
1.1

SCHEDULE

TRIBUNE		STAR		SIZE	COPY # OR CAPTION OR REPEAT # AND DATE
DAY	DATE	DAY	DATE		
Sun	11-5	1578	5x2524	Who Do you owe Dane?	
<u>Sun</u>	<u>11-5</u>	<u>1578</u>	<u>5x2524</u>	<u>Who Do you owe Dane?</u>	
Mon	11-6	1579	5x1964	Your DFL Sample Ballot	
		<u>Mon</u>	<u>11-6</u>	<u>5x1964</u>	<u>Your DFL Sample Ballot</u>

- JF

PRINTING MATERIAL

- ☒ Herewith
- ☐ To Come
- ☐ You Have

MISCELLANEOUS INSTRUCTIONS

t/s to above
pull velox of mon 11/6 ad
for St Paul

JUNE
Morning and Sunday

SATURDAY
Morning

UPL. Common Sense Comm

CHECK NO: 41747.93

AD NO. N 1421

TERRITORY

26697

SIZE 5 x 106

SALESMAN

JV

401 Midwest Federal Bldg

LINES 980

St Paul 55101

RATE Political

DESCRIPTION OR
PRODUCT

Political

MENS ☐ WMS ☐

MAIN STORE ☐ BSMT ☐

COLOR

POSITION

1st News

COUPON

ORDER
WRITTEN
BY

1st 10/27/71

PICKUP - - DAY LAST RUN

--- STAR ZONES ---

1 2 3 4 5
☐ ☐ ☐ ☐ ☐

--- TRIB ZONES ---

METRO N S
☐ ☐ ☐

-SUNDAY-

FULL METRO COUNTRY
RUN ONLY ONLY

TRIBUNE

STAR

DAY

DATE

DAY

DATE

Tues

Oct 31

Rpt #1361, 10/30-W

MAIL YOU HAVE

LOC #4017 INSERTION ORDER 1177

ADV. BOOKKEEPING LOCAL

3304041163

THE MINNEAPOLIS STAR
Evening

THE MINNEAPOLIS TRIBUNE
Morning and Sunday

SATURDAY
Morning

ADVERTISER **DPL Common Sense Comm**

AD NO **N 1449**

CLASSIFICATION **CHECK HW: \$1210.00**

SIZE **5 x 196**

TERRITORY **N 26697 26697**

LINES **980**

SALESMAN

RATE **Political**

JP

MENS ☐ WWS ☐

Ppls

DESCRIPTION OR PRODUCT **"The Star-Trib Boys..."**

MAIN STORE ☐ BSMT ☐

COLOR

POSITION **Main News Colse to front as possible**

PICKUP - - DAY LAST RUN

COUPON

ORDER
WRITT
BY

Tvt 10/30/78

--- STAR ZONES ---

1 2 3 4 5
☐ ☐ ☐ ☐ ☐

--- TRIB ZONES ---

METRO N S
☐ ☐ ☐

---SUNDAY---

FULL METRO COUNTRY
☐ ☐ ☐
HUN ONLY ONLY

TRIBUNE

STAR

DAY

DATE

DAY

DATE

Tues Nov 2

MATL HM

TS PROOFS: 401 Midwest Fedl Bldg

LOC F4017 INSERTION ORDER 1177

ADV. BOOKKEEPING LOCAL

33040-11163

THE MINNEAPOLIS STAR
Evening

THE MINNEAPOLIS TRIBUNE
Morning and Sunday

SATURDAY
Morning

ADVERTISER 7L Cannon Range Corp.

AD NO 1361

CLASSIFICATION

TERRITORY

SALESMAN

38

26697

check inv/82002.10

401 Midwest Federal Bldg

St. Paul 55101

SIZE 5 x 10

LINES 900

RATE Political

MENS ☐ WMS ☐

MAIN STORE ☐ BSMT ☐

DESCRIPTION OR PRODUCT

Political

COLOR

POSITION 1st Floor 3300

COUPON

ORDER
WRITTEN
BY

PICKUP DAY LAST RUN

--- STAR ZONES ---

1 2 3 4 5
☐ ☐ ☐ ☐ ☐

--- TRIB ZONES ---

METRO N S
☐ ☐ ☐

--- SUNDAY ---

FULL METRO COUNTRY
RUN ONLY ONLY

TRIBUNE

STAR

DAY DATE

DAY DATE

Day

Dec 2

789/25 Jan 4

Step 1

Step 2

LOCATED IN SECTION ORDER 1177

ADV. BOOKKEEPING LOCAL

8304041163

THE MINNEAPOLIS STAR
Evening

THE MINNEAPOLIS TRIBUNE
Morning and Sunday

SATURDAY
Morning

ADVERTISER DEPT. Common Sense Comm

AD NO. 11

CLASSIFI-
CATION

check for \$2084.07

SIZE 5 x 196

TERRITORY

401 Midwest Plaza

LINES 980

SALESMAN

JP

St. Paul 55101

RATE Political

MENS ☐ WMS ☐

26697

DESCRIPTION OR
PRODUCT

"Why won't they print it"

MAIN STORE ☐ BSMT ☐

COLOR

POSITION 1st News

COUPON

ORDER
WRITTEN
BY

less 11/01/78

PICKUP - DAY LAST RUN

--- STAR ZONES ---

1 2 3 4 5
☐ ☐ ☐ ☐ ☐

--- TRIB ZONES ---

METRO N S
☐ ☐ ☐

--- SUNDAY ---

FULL METRO COUNTRY
RUN ONLY ONLY

TRIBUNE

STAR

DAY

DATE

DAY

DATE

Sat Nov 4

Matl to come 11/2

TS Proofs

LOC 4017 INSERTION ORDER 1173

ADV. BOOKKEEPING LOCAL

3304041163

THE MINNEAPOLIS STAR
Evening

THE MINNEAPOLIS TRIBUNE
Morning and Sunday

SATURDAY
Morning

ADVERTISER **DFL Common Sense Comm**

AD NO **N**

CLASSIFI-
CATION

OK W/ #1578

SIZE **5 x 196**

TERRITORY

N 26697 26697

LINES **980**

SALESMAN

JF

RATE **Political**

St Paul

MENS ☐ WMS ☐

DESCRIPTION OR
PRODUCT

Your DFL Sample Ballot

MAIN
STORE ☐ BSMT ☐

COLOR

POSITION

1st News Paged

COUPON

ORDER
WRITTEN
BY

PICKUP -- DAY LAST RUN

-SUNDAY-

1st 11/2/78

--- STAR ZONES ---

1 2 3 4 5
☐ ☐ ☐ ☐ ☐

FULL METRO COUNTRY
☐ ☐ ☐
RUN ONLY ONLY

--- TRIB ZONES ---

METRO N S
☐ ☐ ☐

TRIBUNE

STAR

DAY

DATE

DAY

DATE

Mon Nov 6

MAIL IN

VELOX FOR ST PAUL

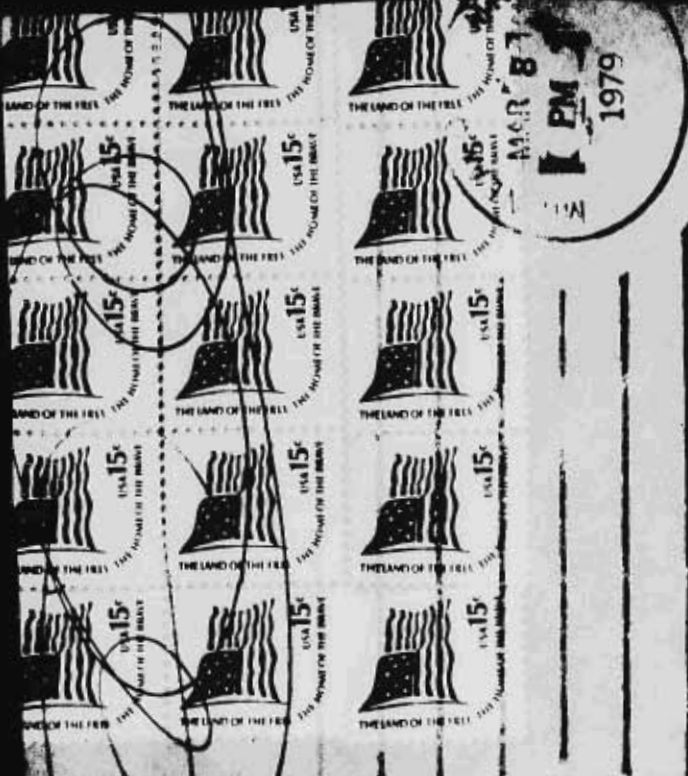
TE PROOFS: 401 Midwest Poff Bldg St Paul

LOC F4017 INSERTION ORDER 1177

ADV. BOOKKEEPING LOCAL

33040411637

83040411608



ERTIFIED
P06 6703104
MAIL

The Minneapolis Star Minneapolis Tribune

425 PORTLAND AVENUE
MINNEAPOLIS, MINNESOTA 55488
Mary Joan Berg



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street North West
Washington, D.C. 20463

Newspapers make a big difference in people's lives . . . every day

1973 Stamp 4242 Ave.
St. Paul, Min. 55113
February 22, 1979

William C. Aldaker
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Aldaker,

In response to the questions set forth in the
enclosure to your letter dated February 7, 1979
regarding The Staff for Senate Committee of
Volunteers:

1. Chairwoman
2. No official duties.
3. There were many volunteers. I don't know all of their
names, but am sure rosters were kept that would
be available to the FEC.
4. I don't know.
5. I was not authorized to receive or expend funds.
I assume Robert Foster or some other individual
was responsible for this.
6. I don't know.
7. I don't know.
8. I don't know.
9. Robert Foster, Treasurer. I believe he was a volunteer.
I met Mr. Wozniak during the campaign, but I
don't know what, if any, duties he assumed. I
don't know how, or whether, any of the others
listed were involved with the campaign.
10. I wasn't the custodian of records. I've never
reviewed any of them, and I don't have access
to them.
11. I don't know.

8304341163

12. Question not applicable.

Sincerely,
Mrs Sharon Jensen
Chairwoman
Short for Senate
Committee of Volunteers

83040411671

10 FEB 30 65:20

RECEIVED

10 FEB 30 1965

Federal Election Commission
1325 K Street N.W. Washington D.C.

79 JAN 22 PM 2:47

Suzanne Callahan

0000.0

Re. "Catholic Bulletin" ad
in support of Robert Short.

Dear Mrs Callahan:

A Schedule "E" was not included in the material sent
me. Please let me know if this ^{letter} does not comply
with Section 109.2 & the questions in your letter.

The signators of the ad during the last half of October, 1948
by consensus agreed to place the ad in the Catholic Bulletin.
There was no formal committed organizational meeting, and my
name was placed in the ad to comply with a state statute
dealing with political ads appearing in newspapers.

The only expenditure made was for this ad, that cost
\$686.42. The signator was responsible for paying for this
ad, and no contributions exceeded \$100.00. The funds were
paid to the Bulletin on Oct 31, 1948. The ad was in support of
Bob Short, Candidate for U.S. Senate.

Sincerely,
Suzanne Davis

83040411671

2000 7000

'79 JAN 8 PM 1:07

900073

January 4, 1979

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Re: MUR 812 (78)

Dear Mr Oldaker

I am in receipt of your letter dated December 21, 1978, and received by certified mail in my office on December 26, 1978. My response today is within ten days of receipt of notification.

Attached is a copy of the letter of agreement made with the R E Short Co. and the Bob Short for Senate Committee of Volunteers.

Prior to the "Committee" moving into the space within "The Globe Building", the building had been vacant for over one year. Since the "Committee" moved out in early November, 1978, the building is again vacant and efforts to rent it or portions of it have been unsuccessful. Thus, under the circumstances, the monthly rent specified was fair market rent and can hardly be said to show favoritism to the Committee. We had an empty building - vacant for over a year - and anything we could get would be good for us.

Because of the number of properties which this corporation owns and manages, alongwith many other properties managed by the same personnel, it does not send out regular monthly rental statements. Our records show that tenants in a number of our rental units are currently in arrears, or have been in arrears of four months or more. Due to our poor accounting and billing system, it is not unusual for us to have rental past due. R E Short Co. is currently investigating the possibility of computerizing its rental records.

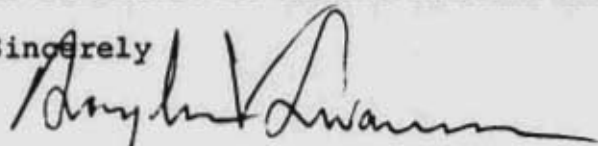
3304041160

Specifically, with the "Committee", we find that no rental bills were presented to the "Committee". Additionally, the "Committee" had indicated to our property manager their displeasure with the space because of lack of heat and air conditioning.

On October 10, 1978, the "Committee" did pay us a lump sum payment of \$2,400.00 to cover rents on the basis of \$400.00 per month for the six month period. You may note that this payment was made well in advance of any complaint being filed against our company.

In conclusion, I hardly think that these circumstances constitute an extension of credit outside the normal course of business.

Sincerely



Douglas V Swanson
Assistant Treasurer
R E Short Co.
215 South 11th Street
Minneapolis, Minnesota 55403

Enclosure

3304041167

Bob Short for Senate Committee
of Volunteers
P. O. Box 9402
Minneapolis, Minnesota

May 5, 1978

Mr. Ralph Meyer
Building Superintendent
Hotel Leamington
1014 Third Avenue South
Minneapolis, Minnesota 55404

Dear Ralph:

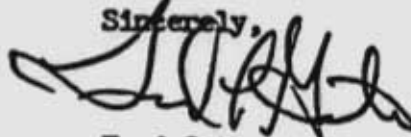
This letter will confirm the details of the oral lease we have entered into with you on behalf of the Bob Short for Senate Committee of Volunteers. We will execute a written lease as soon as one is prepared.

Commencing on May 1, 1978, we will lease that part of the first floor of the Globe Building which fronts on Marquette Avenue. Those premises will be furnished with desks, tables and chairs. We will pay as rent for the space and furniture \$400.00 per month on or before the 10th of each month.

This rental agreement is terminable at will by either party with five days notice. We understand that you have been looking for tenants for this building for over a year without any success and that you will continue this search.

If this letter accurately spells out our agreement, please sign the enclosed copy on the line indicated below and return it to us in the enclosed self-addressed envelope. Please retain the original for your files.

Sincerely,



Fred Gates

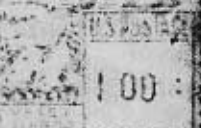
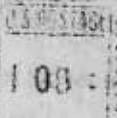
FG/lk
Enclosures

I hereby agree to the terms of the above-stated rental agreement.


Ralph Meyer



Douglas V Swanson
E Short Co
5 So. 11th St.
St. Paul, Minn 55403



Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

19 JAN 8 PM 1-07

0 1 1 1 1 6
CERTIFIED
No. 588676

MAIL

3
CERTIFIED-RETURN RECEIPT REQUESTED

Sharon Jensen
3 Hanbridge Ave.
Dart. Mo. 55113



83040411

71:21 PM 2

MAR 6

Mr. William C. Aldaker, General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

EXX# 6099

73 JAN 5 PM 1:07

January 4, 1979

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

Certified/Return Receipt Requested

Re: MUR 812 (78)

900075

Dear Mr Oldaker

In your letter of December 21, 1978, you raise a number of questions concerning the activities of the Short for Senate Committee of Volunteers. You state that the Commission has reason to believe the committee violated:

1. 11 CFR 110.9(a) -

We did not violate this regulation. All of the contributions received by this committee were within the legal limits and properly reported. Please see the "Reports of Receipts and Expenditures" which are on file.

2. 2 USC - P 441(b) -

This statute was not violated. Please see the attached letter from Douglas V Swanson, Comptroller for R E Short Co., and the lease agreement the Committee had with that company.

3. 2 USC P 441(b) -

We did not violate this statute. The committee had two WATS lines and charges for hundreds of long distance phone calls.

4. 2 USC P 434(b) -

This statute was not violated. All in kind contributions were properly reported. The two committees mentioned in the last paragraph of the first page of your letter of December 21, 1978 were not authorized by the Short for Senate Committee, and therefore their expenditures were independent within the meaning of the Act and not in kind contributions.

33040411603

Federal Election Commission
January 4, 1979
Page Two

I have also enclosed answers to the questions you enclosed with your December 21 letter.

Sincerely



Robert J Foster
Treasurer
Short for Senate Committee of Volunteers

Enclosures

CERTIFIED/RETURN RECEIPT REQUESTED

93040411600

1. The Committee had its main office at:

1011 Marquette Avenue
Minneapolis, Minnesota

We also had offices at:

360 St Peter Street
St Paul, Minnesota

280 Palladio Building
Duluth, Minnesota

2. Contracting party for offices:

Minneapolis: R E Short Co.
215 So. 11th Street
Minneapolis, Minnesota 55403

St Paul: St Paul Hotel
363 St Peter St.
St Paul, Minnesota

note: After November 1
Douglas Realty, Inc.
700 St Paul Building
St Paul, Minnesota

Duluth: Bowman Corporation
500 First National Bank Building
Duluth, Minnesota 55802

3. (a) Dates of Occupancy:

Minneapolis: May 1, 1978 to November 7, 1978
St Paul: June 15, 1978 to November 7, 1978
Duluth: August 1, 1978 to November 7, 1978

- (b) Rental Rate:

Minneapolis: \$400/month
St Paul: \$200/month
Duluth: \$200/month

- (c) Rental payment due date:

Minneapolis: 10th of each month as billed
St Paul: As billed
Duluth: 15th of each month for following
month as billed

4. No corporate lines were used. The "Committee" paid the Northwestern Bell Telephone Company for the services of two statewide WATS lines. In addition, our long distance bills for out of state calls averaged over \$1,000 per month - clearly a sum which indicates that no out of state WATS was used or available. Our records on telephones are open and your Commission is welcome to inspect them.

33040411700

Bob Short for Senate Committee
of Volunteers
P. O. Box 9402
Minneapolis, Minnesota

May 5, 1978

Mr. Ralph Meyer
Building Superintendent
Hotel Leamington
1014 Third Avenue South
Minneapolis, Minnesota 55404

Dear Ralph:

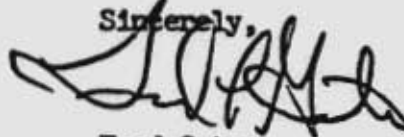
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This rental agreement is terminable at will by either party with five days notice. We understand that you have been looking for tenants for this building for over a year without any success and that you will continue this search.

If this letter accurately spells out our agreement, please sign the enclosed copy on the line indicated below and return it to us in the enclosed self-addressed envelope. Please retain the original for your files.


Sincerely,



Fred Gates

FG/lk
Enclosures

I hereby agree to the terms of the above-stated rental agreement.


Ralph Meyer

January 4, 1979

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Re: MUR 812 (78)

Dear Mr Oldaker

I am in receipt of your letter dated December 21, 1978, and received by certified mail in my office on December 26, 1978. My response today is within ten days of receipt of notification.

Attached is a copy of the letter of agreement made with the R E Short Co. and the Bob Short for Senate Committee of Volunteers.

Prior to the "Committee" moving into the space within "The Globe Building", the building had been vacant for over one year. Since the "Committee" moved out in early November, 1978, the building is again vacant and efforts to rent it or portions of it have been unsuccessful. Thus, under the circumstances, the monthly rent specified was fair market rent and can hardly be said to show favoritism to the Committee. We had an empty building - vacant for over a year - and anything we could get would be good for us.

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33040411700

Specifically, with the "Committee", we find that no rental bills were presented to the "Committee". Additionally, the "Committee" had indicated to our property manager their displeasure with the space because of lack of heat and air conditioning.

On October 10, 1978, the "Committee" did pay us a lump sum payment of \$2,400.00 to cover rents on the basis of \$400.00 per month for the six month period. You may note that this payment was made well in advance of any complaint being filed against our company.

In conclusion, I hardly think that these circumstances constitute an extension of credit outside the normal course of business.

Sincerely

Douglas V Swanson
Assistant Treasurer
R E Short Co.
215 South 11th Street
Minneapolis, Minnesota 55403

Enclosure

03040411700

Bob Short for Senate Committee
of Volunteers
P. O. Box 9402
Minneapolis, Minnesota

May 5, 1978

Mr. Ralph Meyer
Building Superintendent
Hotel Leamington
1014 Third Avenue South
Minneapolis, Minnesota 55404

Dear Ralph:

This letter will confirm the details of the oral lease we have entered into with you on behalf of the Bob Short for Senate Committee of Volunteers. We will execute a written lease as soon as one is prepared.

Commencing on May 1, 1978, we will lease that part of the first floor of the Globe Building which fronts on Marquette Avenue. Those premises will be furnished with desks, tables and chairs. We will pay as rent for the space and furniture \$400.00 per month on or before the 10th of each month.

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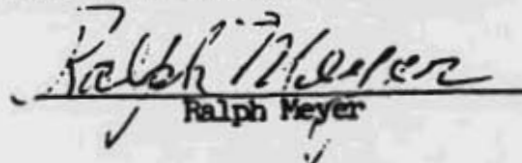
Sincerely,



Fred Gates

FG/lk
Enclosures

I hereby agree to the terms of the above-stated rental agreement.


Ralph Meyer

Port Foster
Third Avenue South
Minn 55404

404117

CERTIFIED

No. 588674

MAIL

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED/RETURN RECEIPT REQUESTED

6004

6097

AD
COLLECTION

'79 JAN 8 PM 1:56

January 4, 1979

000005

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED-RETURN RECEIPT
REQUESTED

Re: MUR 812 (78)

Dear Mr Oldaker

I am responding to your letter dated December 21, 1978, and received at my home by certified mail on December 26, 1978. My response today is within the ten day limitation after receipt of your notification.

Your letter raises a number of questions concerning the "Short for Senate Committee of Volunteers", my principal campaign committee, and other independent committees which claim to have supported my candidacy.

Your letter states that the Commission has reason to believe that my principal campaign committee violated 2 U.S.C.P.434 (b), P 441 (b) and 11 CFR 110.9 (a). We have reviewed these regulations and we are certain that we did not violate these sections or any portion of the Federal Election Campaign Act of 1971, as amended.

You have on file all our reports from the "Statement of Organization" as well as all of our "Reports of Receipts and Expenditures", all filed in a timely fashion, which will confirm our compliance.

You have additionally set forth five specific questions which you have asked that I reply to. My replies are as follows:

000004117006

1. In April, 1978, I authorized my principal campaign committee, the Bob Short for Senate Committee of Volunteers, to receive contributions and make expenditures for my 1978 Senate Campaign.

On September 8, 1978, I further authorized an affiliated committee, The Democrats, Republicans and Independents United for a Pro-Life Senate, to receive contributions and make expenditures as a committee affiliated to my principal committee.

2. In late October, 1978, I became aware through friends, that a group of people were getting together to make efforts on behalf of my candidacy. I later learned that this group formed a committee known as the "Just a Bunch of Plain DFL Folks Who Want Common Sense Government". I had no knowledge of any specific activities that this group planned until I saw an advertisement in a local newspaper placed by the "Just A Bunch Committee". I did not authorize this committee or any of its activities. Nor did anyone associated with my principal campaign committee cooperate or consult with those on the Plain Folks Committee regarding campaign spending or strategy.

3. In mid October, 1978, one of my employees, Oscar Molomot, told me that there were a number of my employees who were upset with the anti-union posture that the local media was painting me in. Oscar Molomot indicated to me that the employees wanted to chip in their own money and place a newspaper ad telling the public that I was a good employer. I advised Oscar Molomot against it. Oscar told me that he and the others knew I would say no, but that it didn't matter because they were going to do it anyway. After that conversation, I had no further communication on this matter - I was on the road campaigning every day - until I saw the ad in the newspaper.

4. As indicated in question number two, I was made aware in late October, 1978, by some friends that they intended to do something on behalf of my candidacy. Shortly after they ran their first newspaper ad, I called the Chairman of the "Just a Bunch" Committee, whose name I saw in the disclaimer of that ad, and told him that I appreciated his support. Other than that one phone conversation, I had no additional conversation and sent no written correspondence to this group.

5. As indicated in question number three, I was made aware in mid October, 1978, by Oscar Molomot, that my employees wanted to place an ad. I had no further communication on this matter. After the ad ran, whenever I would see one of my employees whose name I would recall seeing in the ad, I would say "thank you for your support".

93040411707

Federal Election Commission
January 4, 1979
Page Three

I hope that these replies are sufficient to your inquiry.
If you need additional information, I will respond at your
request.

Truly

Robert E. Short, Jr.
Robert E Short

Dictated but not read

03040411708

041170
ert E Short
Third Avenue South
neapolis, Minnesota 55404



SEF NG
AF RICA

UNITED STATES

Mr William C Oldaker
General Counsel
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

CERTIFIED

No 588741

MAIL

NOTIFIED-RETURN RECEIPT REQUESTED

THE EMPLOYEES OF BOB SHORT COMPANIES COMMITTEE
1014 Third Avenue South
Minneapolis, Minnesota 55404

Geo 4098

79 JAN 5 PM 1:53

January 3, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms Suzanne Callahan
Federal Election Commission
1325 K Street Northwest
Washington, D C 20463

000073

Re: MUR 812 (78)

Dear Ms Callahan

Below is a summary which I believe is relevant to the Commission's analysis of activity of myself and The Employees of Bob Short Companies Committee in support of the Candidate Bob Short.

The Employees of Bob Short Companies Committee was a grass-roots group, formed when a number of employees of Candidate Short could not understand why the principal committee of the Candidate Short was not extolling Mr Short as a trustworthy, reliable and reasonable employer:

This was at a time when those in opposition to his candidacy were portraying him as non-union, unsympathetic, in effect an unconscionable employer and individual.

No one seemed to come to his defense.

Here were individuals who had worked for Mr Short almost 30 years or so at his truckline, or some 15 years at the Hotel Leamington.

They were incensed.

A number of the employees of both the truckline, Admiral Merchants Motor Freight, Inc., and the Hotel Leamington queried me as one who had worked for Mr Short for more than 23 years, and on his corporate payroll into the 19th.

What can we do to refute the abuse heaped on Mr Short, they asked. The obvious answer was an advertisement in the local press.

I then conceived of the committee that subsequently was called Employees of Bob Short Companies. That's what it was - a group of individuals who at that time worked for Mr Short, drew their weekly paycheck and relied on him for their livelihood.

0000411710

The Federal Election Commission
January 3, 1979
Page Three

Here, too, it was a single solicitation.

I wrote the copy for the advertisement. No consultation was had with Mr Short or his principal Committee, The Short for Senate Volunteer Committee. Absolutely no advice or monies was solicited from them.

The disclaimer at the bottom of the advertisement was honest and correct. The Statement of Organization was filed properly and within the time-frame required by law.

The complete advertisement was planned by me, key-lined and arrangements made with the Minneapolis and St Paul papers by me on behalf of the Employees of Bob Short Companies Committee.

A total of \$4,425.00 was contributed by employees of Bob Short Companies, and expenditures for space in the Minneapolis Star and Minneapolis Tribune and St Paul Dispatch and St Paul Pioneer Press, plus key-line and advertising proof-sheets amounted to \$4,226.96. The surplus of \$198.04 was sent to the United Way of Minneapolis area, a charitable non-profit organization.

A final termination report was mailed on December 22, 1978, to the Secretary of the U S Senate, Washington, D C, as required by the Federal Election Commission, with a copy forwarded to the Minnesota Secretary of State.

The reimbursements which I received for campaign-related activities of the principal "Short for Senate Volunteer Committee", were totally unrelated to the Employees of Bob Short Companies Committee. These involved expenditures for materials needed by Mr Short or the principal committee. It did not involve services. Where time was involved because of my corporate relationship with Mr Short, the corporation was reimbursed.

The General Chairman of the principal campaign committee did not desire my services nor advice. That was made clear when he undertook his assignment. I remained the Advertising Manager and Public Relations Director of the Leamington Hotels and Admiral Merchants Motor Freight, Inc.

I know of no case where any individual exceeded the contributions limitations of 2 U.S.C.441a when his or her contribution to the Employees Committee is added to direct contributions made to the principal campaign committee.

My efforts, as well as those of Mr Traun and Ms Knapp were totally voluntary and were over and above our corporate responsibilities and work load.

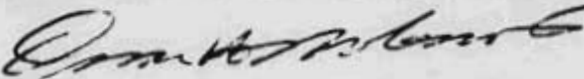
The Federal Election Commission
January 3, 1979
Page Four

Employees of Bob Short Companies believe that their action was correct. It was an independent action, prompted by the abuse that opponents of Mr Short had leveled at him.

It was an honest effort.

Sincerely

EMPLOYEES OF BOB SHORT COMPANIES COMMITTEE



Oscar H Molomot, Chairperson

Enclosures

33040411713

FEDERAL ELECTION COMMISSION - RE: MUR 812 (78)
RE: EMPLOYEES OF BOB SHORT COMPANIES COMMITTEE
ANSWERS TO QUESTIONS:

1. The "Committee" was organized on October 18, 1978.
2. The "Committee" planned to place its advertisements on October 18, the size was yet to be determined, since we did not know how much monies would be contributed. Arrangements for placing the advertisements were made on October 27, 1978.
3. October 25, 1978, was the date that the Committee's total receipts of contributions exceeded \$1,000.
4. The Committee at no time sought authorization from Mr Short to receive contributions or make expenditures on his behalf.
5. The organizers, officers, members and personnel of the committee were as follows: Oscar Molomot, 2950 Dean Parkway, Minneapolis, Minnesota 55416, Chairperson; Mrs Ann Knapp, 1014 Third Avenue South, Minneapolis, Minnesota 55404, Chairperson; H.P. Traun, 215 South 11th Street, Minneapolis, Minnesota 55403, Chairperson; Larry J Weisgram, 1103 Cedarview Drive, Minneapolis, Minnesota 55405, Treasurer.

They were not involved in prior campaign activity on behalf of Mr Short, other than intermittent office activity, i.e. addressing, phoning, folding literature, at the Headquarters of the principal committee, and all this after their regular working hours.

6. Mr Short heard of my intentions to solicit contributions to defray the cost of an advertisement to tell the general public what employees of Bob Short Companies think of him. This was on October 19, 1978. He advised me against it, saying "what good will it do?". That was the only instance of our communication on this matter. No other committee officer or member discussed or corresponded on this matter with Mr Short or his authorized agents regarding his campaign activities. I did not discuss or correspond campaign activities with Mr Short or his agents.
7. Mr Short offered no suggestion to "The Committee" other than the aforementioned, "what good will it do?".
8. Solicitation was made directly to employees of the hotel and employees of the truckline's general headquarters by Oscar Molomot, with support from Mr Traun and Mrs Knapp, who spoke on why this action was taken. The plan was relayed by Mr Molomot and Mr Traun to terminal managers who made oral solicitation to the employees operating out of their respective terminals. The hotel employees filled out contribution forms, with the amount noted, and submitted their contribution to me either in cash or check immediately thereafter. The same was true of employees of the truckline, but the amounts were noted on letters from the terminal managers to the Committee, and the money, either in check or cash, was submitted to Mr Traun. All contributions were ear-marked for this Information Advertisement. Enclosed is a copy of the solicitation material.

es of Bob Short Companies Cmte.
ird Avenue South
inn 55404

11171

FEDERAL ELECTION
COMMISSION



79 JAN 6
Ms Suzanne Gallahan
Federal Elections Commission
1325 K Street Northwest
Washington D C 20463

RETURN RECEIPT REQUESTED

CERTIFIED

No 609995

MAIL

3 3 0 4 0 4 1 1 7 !

Mr. Molomot:

I authorize the listing of my name, along with other employes,
in the advertisement telling the public "What We Employes of
Bob Short Think of Him."

(Cont)

I will contribute (\$10 - 35 -- 32) which I will give
amount
to my department head or Mr. Molomot.

(Please Do This Today)

Jon Gaining

Jon Gaining - Ray, Mo
Name City of Residence

Mr. Molomot:

I authorize the listing of my name, along with other employes,
in the advertisement telling the public "What We Employes of
Bob Short Think of Him."

I will contribute \$1.00 (\$10 -- 35 -- 32) which I will give
amount
to my department head or Mr. Molomot

(Please Do This Today)

Evelyn Davis Mpls.
Name City of Residence



PROTECT OUR ENVIRONMENT

Ms. Suzanne Callahan
Federal Election
Commission
1305 K Street NW
Washington, D.C. 20463

73 J

09

FIRST CLASS

GL-6034

FEDERAL ELECTION
COMMISSION

December 27, 1978

'79 JAN 2 PM 3:09

Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Attention: Suzanne Callahan

RE: MUR 812 (78)

000780

Dear Ms. Callahan:

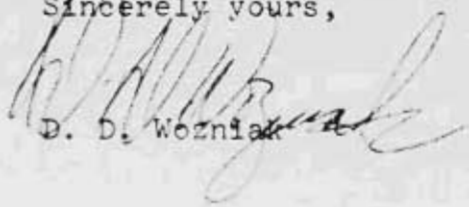
Although I have been a friend of Bob Short's for many years, the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee did not coordinate its activities with those of Short's principal Campaign Committee. I had no special knowledge of the needs, plans or prospects of either Short or his special Campaign Committee. The expenditures made by the Plain Folks Committee were, in my opinion, independent expenditures.

It is without question that most, if not all, of the people who participated in the Plain Folks Committee were old friends of Short. We wanted to see that he was elected to the U.S. Senate because all of us believe that he would make a valuable contribution.

However, none of us were satisfied with the way the principal Campaign Committee was being run and the manner in which the campaign itself was being conducted. We felt that a bunch of "Young Turks" were in charge of Short's principal Campaign Committee and that they would not listen to any of our suggestions. We decided to start this independent committee in order to implement our ideas.

I have enclosed answers to the questionnaire you sent me on December 21, 1978.

Sincerely yours,


D. D. Wozniak

Enclosure

33040411718

JUST A BUNCH OF PLAIN DFL FOLKS
WHO WANT COMMON SENSE GOVERNMENT

1. Statement of Organization for a Political Committee (FEC 1)
filed on October 30 or 31, 1978. Copy attached.
2. October 26, 1978.
3. October 27, 1978.
4. October 28 Telegram--\$6,193.01
- a. \$2,833.18--Minneapolis Star and Tribune Co.--by check
for advertising.
 - b. \$1,611.90--St. Paul Dispatch and Pioneer Press--by
check for advertising.
 - c. \$1,747.93--Minneapolis Star and Tribune Co.--by check
for advertising.
- November 2 Telegram--\$14,195.19
- a. \$1,579.30--WCCO am--by check for advertising.
 - b. \$1,619.08--Hersey and Associates--by check for production.
 - c. \$2,084.07--Minneapolis Star and Tribune Co.--by check
for advertising.
 - d. \$1,211.69--St. Paul Dispatch and Pioneer Press--by check
for advertising.
 - e. \$5,390.59--Minneapolis Star and Tribune Co.--by check for
advertising.
 - f. \$2,310.46--St. Paul Dispatch and Pioneer Press--by check
for advertising.

I have enclosed a copy of a letter which was sent to the
Secretary of the Senate detailing our expenditures in excess

of \$1,000.00. I have also enclosed a copy of the expenditures section of our FEC 3.

All expenditures were made on behalf of Mr. Short. However, most advertisements contained the words "Vote for Bob Short and the entire DFL Ticket."

5. No

6. D. D. Wozniak--Chairman

Helped those working in the St. Paul office of Short's principal Campaign Committee until early October. Attended a Fundraiser for Short's principal Campaign Committee in late October. Had a disagreement with Short's Campaign Manager because all advice was ignored.

Walter E. Riordan--Treasurer

No prior involvement with Short's campaign activities.

Karl Rolvaag--Vice Chairman

Former Governor of Minnesota. Endorsed Short in late August 1978. No other involvement. His activity with this Committee was limited to a state-wide media swing.

Peter Popovich--Vice Chairman

Former State Legislator, endorsed Short in late August 1978. Hosted a Fundraiser for Short's principal Campaign Committee in October 1978. However, had no input or involvement as to how funds were used or how campaign was to be conducted.

James Rice--Vice Chairman

State Legislator, endorsed Short in late August 1978. Involved with Short's 1978 campaign prior to Primary--wrote some advertising copy although continued to work for principal

Campaign Committee as a consultant. After Primary, quit in mid October because of disagreements with Short's Campaign Manager.

Frank Ryan--not involved with Short's principal Campaign Committee.

Mike Ryan--not involved with Short's principal Campaign Committee.

7. No

8. No

9. a. All members and officers of this Committee told those we contacted about contributions that we were an independent committee and that all the expenditures made by this Committee would be made without the approval, encouragement, authorization or support of Bob Short.

b. All checks were received payable to "Plain Folks" or "DFL Common Sense Committee".

c. Most were earmarked for use by the Committee in support of Bob Short as the members of the Committee saw fit.

d. No solicitation materials used.

10. Copy of FEC Form 3 is attached.

33040411721

33040411722

The Honorable Stanley Kimmitt
Secretary, The United States Senate
Washington D.C.

Dear Secretary Kimmitt:

Please be advised that the "Just A Bunch of Plain
DFL Folks Who Want Common Sense Government" committee
has made the following expenditures in excess of \$1000:

1. \$2833.18 - Minneapolis Star and Tribune Co.
2. \$1747.93 - " "
3. \$1611.90 - St. Paul Dispatch Pioneer Press
4. \$1210.10 - Minneapolis Star and Tribune Co.
5. \$1579.30 WCCO AM radio
6. \$1619.08 - Hersey & Associates, 315 S. Third St., Mpls.
7. \$2084.07 - Minneapolis Star and Tribune Co.
8. \$1211.69 - St. Paul Dispatch Pioneer Press
9. \$5390.59 - The Minneapolis Star and Tribune Co.
10. \$2310.46 - The St. Paul Dispatch

We have already sent you telegrams containing this
information. Please forward this information to the
Federal Election Commission.

Sincerely,

Walter Riordan

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Just a Bunch of Plain DFL Folks Who Want Common Sense Government	2 Identification Number Applied For
1(b) Address (number and street) 401 Midwest Federal Building	3 Date October 29, 1978
1(c) City, State and ZIP code St. Paul, Minnesota 55101	4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" fill in only those lines on which there has been a change

5 Check one

☐ (a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)
a candidate for _____ in the _____ Election
(Federal office sought) (Year of election)
to be held in the State of _____
(State in which election is held)
(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate)
to receive contributions and make expenditures with respect to the _____ Election(s)
(General, Primary, Runoff, etc.)
held in _____, and will file all reports and statements with the candidate's principal campaign
(Year of election in State)
committee, _____
(Full name of principal campaign committee)
(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

☐ (c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

☒ (d) This committee supports more than one Federal candidate and is not a party committee.

☐ (e) This committee is a _____ committee of the _____ Party.
(National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
None		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

3304041172

Statement of Organization of a Committee

(Page 2)

Name of Committee **Just a Bunch of Plain DFL Folks Who Want Common Sense Government**

7 Area, Scope and Jurisdiction of Committee

- (a) Will this committee operate in more than one State? ☐ Yes ☒ No
(b) Will it operate on a statewide basis in one State? ☒ Yes ☐ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ Yes ☐ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting.

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
Robert Earl Short	8 Merilane Minneapolis, Mn. 55436	U.S. Senator	Democratic-Farmer-Labor
Senator Wendell Anderson	210 Bremer Building 419 No. Robert St. St Paul, Minn 55101	U.S. Senator	Democratic-Farmer-Labor

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
None			

9 If this committee is supporting the entire ticket of a party, give name of party: **N/A**

10 Identify by name, address and position, the person in possession of committee books and records

Full name	Mailing address and ZIP code	Title or position
Walter E. Riordan	1709 First National Bank Minneapolis, Mn. 55402	Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization for a Committee

(Page 3)

Name of Committee: Just a Bunch of Plain DFL Folks Who Want Common Sense Government

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee).

Full name	Mailing address and ZIP code	Title or position
D. D. Wozniak	401 Midwest Federal Bldg. St. Paul, Mn. 55101	Chairman
Walter E. Riordan	1709 First National Bank Minneapolis, Mn. 55402	Treasurer
Karl Rolvaag	Box 132, Inger Route, Deer River, Mn	Vice Chairman
Peter Popovich	314 Minn. Bldg., St Paul, Mn 55101	Vice Chairman
James Rice	2220 Vincent Avenue North, Mpls, Mn	Vice Chairman

12 Does this committee plan to stay in existence beyond the current calendar year? ☐ Yes ☒ No
If "Yes" for how long?

13 In the event of dissolution, what disposition will be made of residual funds? In the event of dissolution, residual funds will be donated to an organization qualifying under Section 501 (c) of the Internal Revenue Code.

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of bank, repository, etc.	Mailing address and ZIP code
Bank of Minneapolis and Trust Co.	809 Nicollet Mall Minneapolis, Mn. 55402

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)).

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

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

Walter E. Riordan
(Signature of Treasurer)

10/30/76
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441 (see instructions).

For further
information
contact

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Just a Bunch of Plain DFL Folks Who Want Common Sense Government	2 Identification Number Applied for
(b) Address (number and street) 401 Midwest Federal Building	3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code St. Paul, Minnesota 55101	(b) If "Yes," for which election? General on 11/7/78 (date) (date)

4 Type of Report (Check appropriate box and complete, if applicable)		(a) <input type="checkbox"/> January 31 Year End Report
(a) <input type="checkbox"/> Amendment For _____ (Which report)	(c) <input type="checkbox"/> July 10 Quarterly Report	(f) <input type="checkbox"/> Monthly Report _____ (Month)
(b) <input type="checkbox"/> April 10 Quarterly Report	(d) <input type="checkbox"/> October 10 Quarterly Report	(g) <input type="checkbox"/> Termination Report
(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) <input checked="" type="checkbox"/> Thirtieth day report following General election on 11/7/78 in the State of Minnesota (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From _____ Through _____

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		\$ - 0 -
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 31,094.00	\$
(a) Subtotal (Add lines 7 and 8)	\$ 31,094.00	\$
9 Total expenditures (From line 25)	\$ 30,122.29	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ - 0 -	\$
11 Contributed items on hand to be liquidated (attach itemized list)	\$	\$
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

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

Walter E. Reardon
(Typed Name of Treasurer or Candidate)

Walter E. Reardon
(Signature of Treasurer or Candidate)

12 Dec 78
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further
information
Contact

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any other purpose.

33040411713

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee		REPORT COVERING THE PERIOD	
Just a Bunch of Plain DFL Folks Who Want Common Sense Government		FROM:	TO:
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other income:			
(a) Itemized (use Schedule A)		\$ 29,850.00	
(b) Unitemized		\$ 1,244.00	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$))			
(d) Subtotal of contributions and other income		\$	\$
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$ 31,094.00	\$ 31,094.00
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21 Independent Expenditures (use Schedule E)		\$ 30,122.29	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$ 30,122.29	\$ 30,122.29
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$	
29 Transfers in (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$	
31 Total Expenditures (from line 25)		\$	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$	

33040117

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 1 of 9 forLINE NUMBER 15 (a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

Steven Fiterman
960 Adeline Lane, Golden Valley, MN

Date (month,
day, year)

10/27/78

Amount of each
receipt this period

\$ 500

Principal place of business

Occupation

Real Estate

☒ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

Susan Fiterman
960 Adeline Lane, Golden Valley, MN

Date (month,
day, year)

10/27/78

Amount of each
receipt this period

\$ 500

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

M. W. Linstroth
6412 Mendelssohn Lane, Hopkins, MN 55343

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 500

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

Larry Smeija
5298 St. Stephens, Moundsview, MN 55112

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Executive

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Angela Wozniak
303 Woodlawn, St. Paul, MN 55105

Date (month,
day, year)

10/21/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Raymond Skowrya, Jr.
136 Beach Avenue, Woodmont, CN 06460

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Management Consultant

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Subtotal of receipts this page (optional)

▶ \$ \$4,500

Total this period (last page this line number only)

▶ \$

Schedule A

July 1976

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 2 of 4 for

LINE NUMBER 15 (a)

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

P. M. Ryan
4200 Ocean Drive, Singer Island, Fla.Date (month,
day, year)

10/28/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Real Estate

☒ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

W. Morgan Fleming
W. 1385 First National Bank, St. Paul, MN 55101Date (month,
day, year)

10/28/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Counsel to Management

☒ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Brian P. Short
828 Midland Bank Building, Minneapolis, MN 55401Date (month,
day, year)

10/29/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Evelyn E. Kress
1489 Riviera Avenue South, Lakeland, MNDate (month,
day, year)

10/29/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Office Manager

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Andrew Shea, M.D.
5020 Blake Road, Edina, MNDate (month,
day, year)

10/30/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Physician

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

E. Harvey O'Phelan, M.D.
606 24th Avenue South, Minneapolis, MN 55454Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 250

Principal place of business

Occupation

Physician

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 250

Subtotal of receipts this page (optional) ▶

\$ \$5,250

Total this period (last page this line number only) ▶

\$

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 3 of 9 for
LINE NUMBER 15 (a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
Just a Bunch of Plain DFL Folk Who Want Common Sense Government			
Full Name, mailing address and ZIP code Marianne D. Short 2215 Summit Avenue, St. Paul, MN 55105		10/28/78	\$1,000
Principal place of business	Occupation Attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000		
Full Name, mailing address and ZIP code P. J. O'Conner 3800 IDS Center, Minneapolis, MN 55402		10/30/78	\$1,000
Principal place of business	Occupation Attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000		
Full Name, mailing address and ZIP code Gabriel Paul The Stadium, Cleveland, Ohio 44114		11/02/78	\$ 250
Principal place of business	Occupation Baseball Executive <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 250		
Full Name, mailing address and ZIP code Joseph Flynn 2605 East Poplar, St. Paul, MN 55104		10/30/78	\$ 500
Principal place of business	Occupation Attorney <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500		
Full Name, mailing address and ZIP code Warren Johnson		11/07/78	\$ 500
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500		
Full Name, mailing address and ZIP code Dorothy J. Flynn 2605 East Poplar, St. Paul, MN 55104		10/30/78	\$ 500
Principal place of business	Occupation Homemaker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500		
Subtotal of receipts this page (optional)			▶ \$ 3,750
Total this period (last page this line number only)			▶ \$

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page 4 of 9 for

LINE NUMBER 15 (a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

William Cooley
2202 Meeting Street, Wayzata, MN 55391

Date (month, day, year)

10/28/78

Amount of each receipt this period

\$1,000

Principal place of business

City Hall
Minneapolis, MN

Occupation

Deputy Mayor

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

K. J. Short
1165 Summit Avenue, St. Paul, MN 55105

Date (month, day, year)

10/28/78

Amount of each receipt this period

\$ 450

Principal place of business

Federal Building
Minneapolis, MN

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 450

Full Name, mailing address and ZIP code

Arthur J. Petrie
612 Baker Avenue, Mankato, MN 56001

Date (month, day, year)

11/01/78

Amount of each receipt this period

\$1,000

Principal place of business

Occupation

Information Requested

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

P. Jane Petrie
612 Baker Avenue, Mankato, MN 56001

Date (month, day, year)

11/01/78

Amount of each receipt this period

\$1,000

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Douglas Thomson
55 East 5th Street, St. Paul, MN 55101

Date (month, day, year)

11/02/78

Amount of each receipt this period

\$ 100

Principal place of business

55 East 5th Street
St. Paul, MN 55101

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Michael J. Paulucci
525 Lake Avenue South
P.O. Box 6509
Duluth, MN 55802

Date (month, day, year)

10/31/78

Amount of each receipt this period

\$ 250

Principal place of business

Grandma's Saloon & Deli
Duluth, MN

Occupation

Executive

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 250

Subtotal of receipts this page (optional)

▶ \$3,800

Total this period (last page this line number only)

▶ \$

Schedule A

July 1976
Federal Election Commission
1325 M Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 5 of 9 for
LINE NUMBER 15(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

James P. Niley

1500 Northwestern Financial Center, Bloomington, MN 55431

Date (month,
day, year)

11/01/78

Amount of each
receipt this period

\$ 100

Principal place of business

1500 Northwestern Financial
Center, Bloomington, MN 55431

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Don Wozniak

1906 Portland Avenue, St. Paul, MN 55104

Date (month,
day, year)

11/03/78

Amount of each
receipt this period

\$1,000

Principal place of business

Information Requested

Occupation

Executive

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Ron Jerrick

Date (month,
day, year)

3/01/78

Amount of each
receipt this period

\$ 100

Principal place of business

Midwestern Underground
Construction Company, Inc.
Anoka, MN

Occupation

Contractor

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

L. A. Marx

1028 Yorkshire Road, Grose Point, Mich. 48230

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 500

Principal place of business

Information Requested

Occupation

Information Requested

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

Mrs. L. A. Marx

1028 Yorkshire Road, Grose Point, Mich. 48230

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 500

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

Dell O. Gustafson

6100 Summit Drive North, Minneapolis, MN 55430

Date (month,
day, year)

11/01/78

Amount of each
receipt this period

\$1,000

Principal place of business

Information Requested

Occupation

Information Requested

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$1,000

Subtotal of receipts this page (optional)

▶ \$ 3,200

Total this period (last page this line number only)

▶ \$

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 6 of 9 for
LINE NUMBER 15 (a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

Larry Vershel
525 Lake Avenue South, Duluth, MN

Date (month,
day, year)

10/31/78

Amount of each
receipt this period

\$ 200

Principal place of business

P. O. Box 6509
Duluth, MN 55806

Occupation

Assistant to the Chairman

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 200

Full Name, mailing address and ZIP code

George L. Ford
11706 Lake Shore Place, Hidden Key
North Palm Beach, Fla. 33408

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

Helen Cooley
2202 Meeting Street, Wayzata, MN

Date (month,
day, year)Amount of each
receipt this period

\$1,000

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 1,000

Full Name, mailing address and ZIP code

C. Bernard Jacobs
6566 France Ave South, Edina, MN 55435

Date (month,
day, year)

11/06/78

Amount of each
receipt this period

\$ 500

Principal place of business

National City Bank
Minneapolis, MN 55480

Occupation

Executive

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Full Name, mailing address and ZIP code

Mrs. O. Molomot
3430 List Place, Minneapolis, MN 55416

Date (month,
day, year)

11/06/78

Amount of each
receipt this period

\$ 200

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 200

Full Name, mailing address and ZIP code

Jack Howard
Route 1, Box 79-C, St. Augustine, Fla. 32084

Date (month,
day, year)

11/07/78

Amount of each
receipt this period

\$ 100

Principal place of business

Occupation

Information Requested

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Subtotal of receipts this page (optional) ▶ \$ 3,000

Total this period (last page this line number only) ▶ \$

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 7 of 9 forLINE NUMBER 15 (a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

Jim Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 250

Principal place of business

State Capitol
St. Paul, MN

Occupation

State Representative

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 250

Full Name, mailing address and ZIP code

Jill Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 250

Principal place of business

Occupation

Homemaker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 250

Full Name, mailing address and ZIP code

Brian Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 100

Principal place of business

Notre Dame
Notre Dame, Indiana 46556

Occupation

Student

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Mary Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 100

Principal place of business

Information Requested

Occupation

Speech Therapist

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Maura Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 100

Principal place of business

Information Requested

Occupation

Child Psychologist

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Sheila Rice
2220 North Vincent, Minneapolis, MN

Date (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 100

Principal place of business

Occupation

Music Therapist

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Subtotal of receipts this page (optional)

▶ \$ 900

Total this period (last page this line number only)

▶ \$

Schedule A

July 1976

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 8 of 9 for

LINE NUMBER 15 (a)

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Just a Bunch of Plain DFL Folk Who Want Common Sense Government

Full Name, mailing address and ZIP code

Devin Rice
2220 North Vincent, Minneapolis, MNDate (month,
day, year)

10/30/78

Amount of each
receipt this period

\$ 100

Principal place of business

Occupation

Student

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

T. P. Krebsbach
1389 University Avenue, St. Paul, MN 55104Date (month,
day, year)

11/10/78

Amount of each
receipt this period

\$ 100

Principal place of business

Midway Chevrolet

Occupation

Auto Dealer

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

L. H. Meyers
1889 Princeton Avenue, St. Paul, MN 55105Date (month,
day, year)

11/15/78

Amount of each
receipt this period

\$ 100

Principal place of business

Twin City Federal
St. Paul, MN

Occupation

Banker

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

William Mazzitello, M.D.
13586 Fischer Trail, Hastings, MN 55033Date (month,
day, year)

11/04/78

Amount of each
receipt this period

\$ 100

Principal place of business

Information Requested

Occupation

Physician

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 100

Full Name, mailing address and ZIP code

Amon G. Carter, Jr.
Star Telegram Building, Ft. Worth, TXDate (month,
day, year)

11/01/78

Amount of each
receipt this period

\$ 250

Principal place of business

Star Telegram Building
Ft. Worth, TX

Occupation

Newspaper

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 250

Full Name, mailing address and ZIP code

John Oswald

Date (month,
day, year)

11/07/78

Amount of each
receipt this period

\$ 500

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500

Subtotal of receipts this page (optional) ▶ \$ 1,150

Total this period (last page this line number only) ▶ \$25,550

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 9 of 9 for

Line Number _____

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Just a Bunch of Plain DFL Folks Who Want Common Sense Government

Full Name, Mailing Address and ZIP Code M. Ryan	Principal Place of Business Benchmark Building No. Palm Beach, Florida	Date (month, day, year) 10/30/78	Amount of each Receipt this Period 1,000.00
Occupation Attorney			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Ron Meshbeshier	Principal Place of Business Meshbeshier, Singer & Spense, Minneapolis, MN	Date (month, day, year) 10/30/78	Amount of each Receipt this Period 100.00
Occupation Attorney			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 100.00			
Full Name, Mailing Address and ZIP Code Peter S. Popovich	Principal Place of Business 314 Minnesota Building St. Paul, MN 55101	Date (month, day, year) 10/27/78	Amount of each Receipt this Period 1,000.00
Occupation Attorney			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Patrick J. McInnis 311 Kenwood Pkwy., Apt. 109 Minneapolis, MN 55403	Principal Place of Business	Date (month, day, year) 10/31/78	Amount of each Receipt this Period 100.00
Occupation Information requested			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 100.00			
Full Name, Mailing Address and ZIP Code Robert Benson 1614 Waverly Place Minneapolis, MN 55403	Principal Place of Business	Date (month, day, year) 11/1/78	Amount of each Receipt this Period 1,000.00
Occupation Information requested			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Julie Benson 1614 Waverly Place Minneapolis, MN 55403	Principal Place of Business	Date (month, day, year) 11/1/78	Amount of each Receipt this Period 1,000.00
Occupation Homemaker			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Eugene C. Neitge 5200 West 73rd Street Minneapolis, MN 55435	Principal Place of Business	Date (month, day, year) 10/30/78	Amount of each Receipt this Period 100.00
Occupation Information requested			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year To Date \$ 100.00			
SUBTOTAL of receipts this page (optional)			\$ 4,300.00
TOTAL this period (last page this line number only)			\$

33040411733

Schedule E

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Independent Expenditures for Line 21 F.E.C. Form 3

Page 1 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full Just a Bunch of Plain DFL Folks Who Want Common Sense Government	Id. No. Applied for
Full Name, mailing address and ZIP code 401 Midwest Federal Building St. Paul, Minnesota 55101	Is This a Separate Report by a Committee Filing on FEC Form 3A? <u>No</u>

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Minneapolis Star & Tribune Co. 425 Portland Avenue Minneapolis, MN 55415	Advertising	11/8/78	2,833.18	Bob Short U. S. Senate
Minneapolis Star & Tribune Co. 425 Portland Avenue Minneapolis, MN 55415	Advertising	10/27/78	1,747.93	Bob Short U. S. Senate
St. Paul Dispatch & Pioneer Press 55 E. 4th Street St. Paul, MN 55101	Advertising	10/27/78	1,611.90	Bob Short U. S. Senate
Minneapolis Star & Tribune Co. 425 Portland Avenue Minneapolis, MN 55415	Advertising	11/1/78	1,210.10	Bob Short U. S. Senate
St. Paul Dispatch & Pioneer Press 55 E. 4th Street St. Paul, MN 55101	Advertising	11/8/78	690.90	Bob Short U. S. Senate

(a) Subtotal of Itemized Independent Expenditures \$ 8,094.01
 (b) Subtotal of Unitemized Independent Expenditures \$ _____
 (c) Total Independent Expenditures \$ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 12/16 day ofDecember, 1978.

My Commission Expires

August 8, 1984

Notary Public

Walter E. Hoyle 12/13/78

SCHEDULE E

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED INDEPENDENT EXPENDITURES
FOR LINE 23, FEC FORM 3**

(See Reverse Side for Instructions)

Page 2 of 2 Pages

Name of Candidate or Committee in Full Just a Bunch of Plain DFL Folks Who Want Common Sense Government				ID No. Applied for	
Full Name, Mailing Address and ZIP Code 401 Midwest Federal Building St. Paul, Minnesota 55101				Is this a Separate Report by a Committee filing on FEC Form 3a? <u>No</u>	
Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.					
Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
WWTC 609 - 2nd Ave. So. Minneapolis, MN 55402	Advertising	11/1/78	476.00	Bob Short U. S. Senate <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
St. Paul Dispatch & Pioneer Press 55 E. 4th Street St. Paul, MN 55101	Advertising	11/1/78	1,211.69	Bob Short U. S. Senate <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose	
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 1,687.69		
(b) SUBTOTAL of Unitemized Independent Expenditures			\$		
(c) TOTAL Independent Expenditures			\$		

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

Schedule E

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Independent Expenditures for Line 21 F.E.C. Form 3

Page 3 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full
Just a Bunch of Plain DFL Folks Who Want Common
Sense Government

Id. No. Applied for

Full Name, mailing address and ZIP code
401 Midwest Federal Building
St. Paul, Minnesota 55101

Is This a Separate Report by a Committee Filing
on FEC Form 3A? No

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
St. Paul Dispatch & Pioneer Press 55 E. 4th Street St. Paul, MN 55101	Advertising	11/2/78	2,310.46	Bob Short U.S. Senate
Minneapolis Star & Tribune Co. 425 Portland Avenue Minneapolis, MN 55415	Advertising	11/1/78	2,084.07	Bob Short U.S. Senate
Minneapolis Star & Tribune Co. 425 Portland Avenue Minneapolis, MN 55415	Advertising	11/2/78	5,390.59	Bob Short U.S. Senate
U. S. Postmaster 1st and Marquette Ave. Minneapolis, MN 55401	Postage	11/2/78	1,140.00	Bob Short U.S. Senate
Hersey & Associates 312 So. 3rd Street Minneapolis, MN 55415	Advertising	11/1/78	1,619.08	Bob Short U.S. Senate

(a) Subtotal of Itemized Independent Expenditures \$12,544.20
(b) Subtotal of Unitemized Independent Expenditures \$
(c) Total Independent Expenditures \$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of

19 _____

My Commission Expires _____

NOTARY PUBLIC

Signature

Date

Schedule E

July 1976

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

Itemized Independent Expenditures
for Line 21 F.E.C. Form 3

Page 4 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full
Just a Bunch of Plain DFL Folks Who Want Common
Sense Government

Id. No.

Applied for

Full Name, mailing address and ZIP code

401 Midwest Federal Building
St. Paul, Minnesota 55101Is This a Separate Report by a Committee Filing
on FEC Form 3A? No

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
KROX Crookston, MN 56716	Advertising	10/27/78	98.60	Bob Short U. S. Senate
KNUJ New Ulm, MN 56073	Advertising	10/27/78	219.00	Bob Short U. S. Senate
KTOE Mankato, MN 56001	Advertising	10/27/78	147.90	Bob Short U. S. Senate
KDAL Duluth, MN	Advertising	11/1/78	655.00	Bob Short U. S. Senate
KQAQ Austin, MN 55912	Advertising	11/1/78	153.00	Bob Short U. S. Senate

(a) Subtotal of Itemized Independent Expenditures \$1,273.50

(b) Subtotal of Unitemized Independent Expenditures \$

(c) Total Independent Expenditures \$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of

19

My Commission Expires

NOTARY PUBLIC

Signature

Date

83040411710

Schedule E

July 1976

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

Itemized Independent Expenditures
for Line 21 F.E.C. Form 3Page 5 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full
Just a Bunch of Plain DFL Folks Who Want Common
Sense Government

Id No

Applied for

Full Name, mailing address and ZIP code

401 Midwest Federal Building
St. Paul, Minnesota 55101Is This a Separate Report by a Committee Filed
on FEC Form 3A? No

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
KCLD St. Cloud, MN 56301	Advertising	11/1/78	404.60	Bob Short U. S. Senate
WKKQ Hibbing, MN 55746	Advertising	11/1/78	183.60	Bob Short U. S. Senate
WHLB Virginia, MN 55792	Advertising	11/1/78	193.80	Bob Short U. S. Senate
WELY Ely, MN 55731	Advertising	11/8/78	93.50	Bob Short U. S. Senate
KUOX Worthington, MN 56187	Advertising	11/8/78	326.00	Bob Short U. S. Senate

(a) Subtotal of Itemized Independent Expenditures \$1,201.50

(b) Subtotal of Unitemized Independent Expenditures \$

(c) Total Independent Expenditures \$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of

_____, 19 ____

My Commission Expires _____

NOTARY PUBLIC

Signature

Date

330404117411

Schedule E

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Independent Expenditures for Line 21 F.E.C. Form 3

Page 6 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full Just a Bunch of Plain DFL Folks Who Want Common Sense Government	Id. No. Applied for
Full Name, mailing address and ZIP code 401 Midwest Federal Building St. Paul, Minnesota 55101	Is This a Separate Report by a Committee Filing on FEC Form 3A? <u>No</u>

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
KKIN Aitkin, MN 56431	Advertising	10/27/78	119.00	Bob Short U. S. Senate
WEVE Eveleth, MN 55734	Advertising	10/27/78	115.60	Bob Short U. S. Senate
WDGY 10332 Bloomington Freeway Bloomington, MN 55431	Advertising	11/8/78	751.40	Bob Short U. S. Senate
WCCO-AM 625 - 2nd Ave. So. Minneapolis, MN 55402	Advertising	11/8/78	1,579.30	Bob Short U. S. Senate
WLOL-FM 801 Nicollet Mall Minneapolis, MN 55402	Advertising	11/8/78	468.35	Bob Short U. S. Senate

(a) Subtotal of Itemized Independent Expenditures \$ 3,033.65
 (b) Subtotal of Unitemized Independent Expenditures \$ _____
 (c) Total Independent Expenditures \$ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of

_____, 19 ____

My Commission Expires _____

NOTARY PUBLIC

Signature

Date

Schedule E

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Independent Expenditures
for Line 21 F.E.C. Form 3**

Page 7 of 7 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full Just a Bunch of Plain DFL Folks Who Want Common Sense Government	Id. No. Applied for
Full Name, mailing address and ZIP code 401-Midwest Federal Building St. Paul, Minnesota 55101	Is This a Separate Report by a Committee Filed on FEC Form 3A? <u>No</u>

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Real Good Productions	Production	11/8/78	440.00	Bob Short U. S. Senate
Real Good Productions	Production	11/1/78	583.00	Bob Short U. S. Senate
Viewmark Productions, Inc. 7360 Ohms Lane Minneapolis, MN 55435	Production + H. G. 1.3.78	11/8/78	1,163.24	Bob Short U. S. Senate
Greyhound Printers 18 Glenwood Avenue Minneapolis, MN 55403	Production	11/1/78	100.00	Bob Short U. S. Senate
Bank of Minneapolis & Trust Co. 809 Nicollet Mall Minneapolis, MN 55402	Check Charge	10/27/78	1.50	Bob Short U. S. Senate

(a) Subtotal of Itemized Independent Expenditures	\$ <u>2,287.74</u>
(b) Subtotal of Unitemized Independent Expenditures	\$ _____
(c) Total Independent Expenditures	\$ <u>30,122.29</u>

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19 _____

My Commission Expires _____

NOTARY PUBLIC

Signature

Date

**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Just a Bunch of Plain DFL Folks Who Want Common Sense Government		2 Identification Number Applied for
(b) Address (number and street) 401 Midwest Federal Building		3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code St. Paul, Minnesota 55101		(b) If "Yes," for which election? General on 11/7/78 (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) <input type="checkbox"/> Amendment For _____ (Which report)		(e) <input type="checkbox"/> January 31 Year End Report
(b) <input type="checkbox"/> April 10 Quarterly Report		(f) <input type="checkbox"/> Monthly Report _____ (Month)
(c) <input type="checkbox"/> July 10 Quarterly Report		(g) <input type="checkbox"/> Termination Report
(d) <input type="checkbox"/> October 10 Quarterly Report		
(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		
(i) <input checked="" type="checkbox"/> Thirtieth day report following General election on 11/7/78 in the State of Minnesota (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From _____ Through _____		
Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		\$ - 0 -
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 31,094.00	\$
(a) Subtotal (Add lines 7 and 8)	\$ 31,094.00	\$
9 Total expenditures (From line 25)	\$ 30,122.29	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ - 0 -	\$
11 Contributed items on hand to be liquidated (attach itemized list)	\$	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

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

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441; (See reverse side of form)

For further
information
Contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Foster, Treasurer
Short for Senate Committee of
Volunteers
P.O. Box 9402
401 Second Avenue South
Minneapolis, MN 55440

Re: MUR 812 (78)

Dear Mr. Foster:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812 (78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
2. 2 U.S.C. §441b by entering into a rental agreement for office space with the R. E. Short Company outside the ordinary course of business.
3. 2 U.S.C. §441b by using corporate WATs lines for campaign purposes.
4. 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions.

The above stated violations of 2 U.S.C. §434(b) and 11 CFR 110.9(a) are based on the Commission's determination that expenditures made on behalf of Robert Short's campaign by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and the Employees of Bob Short Companies Committee are not independent within the meaning of 2 U.S.C. §431p and are therefore considered in-kind contributions to the Short campaign.

33040411710

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Mr. J. L. Miller

● SENDER Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.

1 The following service is requested (check one)
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY Show to whom and date delivered
☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO *Foster
PO Box 9402
411 2nd Ave S
Miami, FL 33130*

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
9413464

(Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE ☐ Addressee ☐ Authorized agent
L. Miller

4 DATE OF DELIVERY *12/29/78*

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

The Commission has found no reason to believe:

1. that the Short for Senate Committee of Volunteers violated the Act for failure to report federal withholding taxes of staff payroll,
2. that the Short for Senate Committee of Volunteers violated the Act by incorrectly reporting the September 6 transfer of \$40,000 to the Democrats, Republicans and Independents United for a Pro Life Senate.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,


William C. Oldaker
General Counsel

Enclosures
Complaint
Questions

83040411718

- and any other information you deem relevant.

4. Regarding the complainants allegation that the Committee used corporate WATs lines for campaign related activities, please state if corporate lines were used and if so, name the corporation which permitted the campaign to use its lines.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Foster, Treasurer
Short for Senate Committee of
Volunteers
P.O. Box 9402
401 Second Avenue South
Minneapolis, MN 55440

Re: MUR 812 (78)

Dear Mr. Foster:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812 (78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
2. 2 U.S.C. §441b by entering into a rental agreement for office space with the R. E. Short Company outside the ordinary course of business.
3. 2 U.S.C. §441b by using corporate WATs lines for campaign purposes.
4. 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions.

The above stated violations of 2 U.S.C. §434(b) and 11 CFR 110.9(a) are based on the Commission's determination that expenditures made on behalf of Robert Short's campaign by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and the Employees of Bob Short Companies Committee are not independent within the meaning of 2 U.S.C. §431p and are therefore considered in-kind contributions to the Short campaign.

The Commission has found no reason to believe:

1. that the Short for Senate Committee of Volunteers violated the Act for failure to report federal withholding taxes of staff payroll,
2. that the Short for Senate Committee of Volunteers violated the Act by incorrectly reporting the September 6 transfer of \$40,000 to the Democrats, Republicans and Independents United for a Pro Life Senate.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

W.C. Oldaker
12/17/78

William C. Oldaker
General Counsel

Enclosures

*Complaint
Questions*



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

R. E. Short Company
215 South 11th Street
Minneapolis, MN 55403

RE: MUR 812 (78)

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein, which pertain to your company, state a violation of 2 U.S.C. §441b (11 CFR 114.10(a)).

As set forth in 11 CFR 114.10(a), "A corporation may extend credit to a candidate, political committee, or other person in connection with a Federal Election provided that the credit is extended in the ordinary course of the corporation's business..."

Reports filed by the Short for Senate Committee of Volunteers indicate that the committee paid the R. E. Short Company \$2,400 for office rental space on October 10, 1978. The time period to which that payment applies is not clear. It appears that your company may have given an extension of credit to a federal campaign which is outside the ordinary course of business.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In your response, please include a copy of the contract which your company entered into with the Short committee.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

Enclosure

Complaint

MUR 812 Callahan

8 3 0 4 0 4 1 1 7 5

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *R.E. Shad*
215 S 11 ST
MN MN 55403

3. ARTICLE DESCRIPTION:
REGISTERED NO. *913463* CERTIFIED NO. INSURED NO.
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
R.E. Shad

4. DATE OF DELIVERY *12-26-78 3:18 PM*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

DEC 26 1978

207-9-24-58

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

R. E. Short Company
215 South 11th Street
Minneapolis, MN 55403

RE: MUR 812 (78)

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein, which pertain to your company, state a violation of 2 U.S.C. §441b (11 CFR 114.10(a)).

As set forth in 11 CFR 114.10(a), "A corporation may extend credit to a candidate, political committee, or other person in connection with ~~the~~ Federal Election provided that the credit is extended in the ordinary course of the corporation's business..."

Reports filed by the Short for Senate Committee of Volunteers indicate that the committee paid the R. E. Short Company \$2,400 for office rental space on October 10, 1978. The time period to which that payment applies is not clear. It appears that your company may have given an extension of credit to a federal campaign which is outside the ordinary course of business.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In your response, please include a copy of the contract which your company entered into with the Short committee.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4050), the staff member assigned to this case.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

SMC
12/19/48 Sincerely,

William C. Oldaker
General Counsel

Enclosure

Complaint

8304041

8304041175

PS Form 3811 Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

812 CAGAHAN

● **SENDER** Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one).
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ **RESTRICTED DELIVERY**
 Show to whom and date delivered
☐ **RESTRICTED DELIVERY**
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 **ARTICLE ADDRESSED TO:** *2nd fl*
435 S Cambridge Ave
St. Louis Park, MN
55424

3 **ARTICLE DESCRIPTION**
 REGISTERED NO. CERTIFIED NO. INSURED NO.
98682

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
[Signature]

4 **DATE OF DELIVERY** *JAN 25 1979* **POSTMARK**
61F

5 **ADDRESS** (Complete only if requested)

6 **UNABLE TO DELIVER BECAUSE** **CLERK'S INITIALS**



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Angell, Treasurer
Democrats, Republicans and
Independents United for a
Pro Life Senate
P. O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

RE: MUR 812(78)

Dear Mr. Angell:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of that portion of the complaint which pertains to you is enclosed. The Commission has no reason to believe that the matters alleged therein state a violation of any statute within its jurisdiction.

Accordingly, the Commission intends to close its file in this matter regarding the specific allegation of failure to report receipt of the \$40,000 transfer in a timely fashion.

If you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

Complaint

830404147

63040411755
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Angell, Treasurer
Democrats, Republicans and
Independents United for a
Pro Life Senate
P. O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

RE: MUR 812(78)

Dear Mr. Angell:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of that portion of the complaint which pertains to you is enclosed. The Commission has no reason to believe that the matters alleged therein state a violation of any statute within its jurisdiction.

Accordingly, the Commission intends to close its file in this matter regarding the specific allegation of failure to report receipt of the \$40,000 transfer in a timely fashion.

If you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

one
12/14/78
William C. Oldaker
General Counsel

Enclosure
Angell



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oscar Molomot, Chairman
Employees of Bob Short Companies Committee
2950 Dean Parkway
Minneapolis, MN 55416

RE: MUR 812(78)

Dear Mr. Molomot:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
5. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above stated violations are based on the Commission's determination that since you have received reimbursement for campaign related activities from the Short campaign, expenditures made by the committee are not considered independent within the meaning of 2 U.S.C. §431p (see 11 CFR 109.1(b)(4) (i)(B)).

Further, the Commission requests that you amend your termination report by filing a summary page and stating the disposition of the Committee's residual funds.

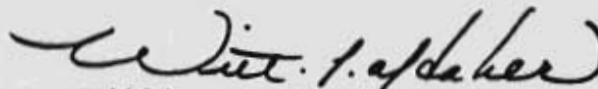
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosures

Complaint
Questions

330404117

33040411750

Post 212 N. 1st St.

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.

1 The following service is requested (check one).
☐ Show to whom and date delivered\$
☒ Show to whom, date, and address of delivery\$
☐ RESTRICTED DELIVERY
Show to whom and date delivered\$
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery\$
(CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO *Melvin H. Belmont*
3450 Jean PKwy
Mun, MN 55416

3 ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943465

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent

4 *Melvin H. Belmont*
DATE OF DELIVERY *Dec. 26 '78* POSTMARK

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO 1977-0-248-585

EMPLOYEES OF BOB SHORT
COMPANIES COMMITTEE ("THE COMMITTEE")

1. On what date was the Committee organized?
2. When did the committee first plan and make arrangements for the placing of political advertisements?
3. On what date did the Committee's total receipt of contributions or making of expenditures exceed \$1,000?
4. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?
5. Identify the organizers, officers, members and personnel of the committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Short. If so, please identify who was so engaged, in what capacity, and on what dates.
6. Did you or any other committee officers or members discuss or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
7. Did Mr. Short or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
8. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Were any contributions to the committee earmarked for a particular candidate?
 - d. Please attach a copy of any solicitation materials utilized by the Committee.
9. In your response, please provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.

83040411751

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oscar Molomot, Chairman
Employees of Bob Short Companies Committee
2950 Dean Parkway
Minneapolis, MN 55416

RE: MUR 812(78)

Dear Mr. Molomot:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1978, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 11 CFR 109.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
5. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above stated violations are based on the Commission's determination that since you have received reimbursement for campaign related activities from the Short campaign, expenditures made by the committee are not considered independent within the meaning of 2 U.S.C. §431p (see 11 CFR 109.1(b)(4)(i)(B)).

Further, the Commission requests that you amend your termination report by filing a summary page and stating the disposition of the Committee's residual funds.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. ~~Where~~ appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

*Amended
Callahan?*

*Sale
12/17/78*

3304041173



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
401 Midwest Federal Bldg.
St. Paul, MN 55101

RE: MUR 812(78)

Dear Mr. Wozniak:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) expenditures in excess of \$1000 were made prior to the election.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
5. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
6. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above-stated violations are based on the Commission's determination that through your contacts with Robert Short and Short's campaign, you may have acquired special knowledge of the candidate's needs, plans, and projects and used that knowledge to organize and advise the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee as to how to coordinate their activities on behalf of Short, thereby

3304041175

negating the independence of the Committee. Therefore, expenditures made by the Committee on behalf of Short may have been in-kind contributions to his campaign.

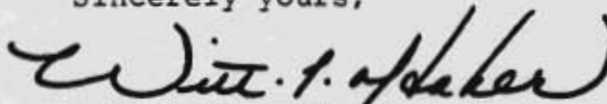
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosures

Complaint
Questions

8304041

33040411755

TRUCK 412. Callahan

PS Form 3811, Apr 1977

● SENDER Complete items 1, 2, and 3.
Add your address in the RETURN TO space on reverse.

1 The following service is requested (check one).
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 Show to whom and date delivered
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO *City of St. Paul*
401 Franklin St. NW
St. Paul, MN 55101

3 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
943461

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
[Signature]

4 DATE OF DELIVERY
DEC 20 1973

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE
 CLERK'S INITIALS

☆GPO 1977-0-246-000

JUST A BUNCH OF PLAIN DFL FOLKS
WHO WANT COMMON SENSE GOVERNMENT ("COMMITTEE")

1. On what date was the Committee organized?
2. When did the committee first plan and make arrangements for the placing of political advertisements?
3. On what date did the Committee's total receipt of contributions or making of expenditures exceed \$1,000?
4. On October 28 and November 2, the Committee reported, via telegram, expending \$6,193.01 and \$14,195 respectively. Please state on behalf of which candidate(s) the expenditures were made and in what manner and amounts.
5. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?
6. Identify the organizers, officers, members and personnel of the committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Short? If so, please identify who was so engaged, in what capacity, and on what dates.
7. Did you or any other committee officers or members discuss or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
8. Did Mr. Short or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
9. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Were any contributions to the committee earmarked for a particular candidate?
 - d. Please attach a copy of any solicitation materials utilized by the Committee.
10. In your response, please provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.

33040411767

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
401 Midwest Federal Bldg.
St. Paul, MN 55101

RE: MUR 812(78)

Dear Mr. Wozniak:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) expenditures in excess of \$1000 were made prior to the election.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
5. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
6. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above-stated violations are based on the Commission's determination that through your contacts with Robert Short and Short's campaign, you may have acquired special knowledge of the candidate's needs, plans, and projects and used that knowledge to organize and advise the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee as to how to coordinate their activities on behalf of Short, thereby

3 3 0 4 0 4 1 1 7 3 2

negating the independence of the Committee, therefore, expenditures made by the Committee on behalf of Short are considered in-kind contributions to his campaign.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

William C. Oldaker
General Counsel

WCO
12/19/78

33040411759



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Powers, Treasurer
735 E. Co. Rd. B.
St. Paul, MN 55117

RE: MUR 812(78)

Dear Mr. Powers:

The Commission has received a complaint from Paul Overgaard, chairman of the Durenburger for Senate Campaign, which included the enclosed advertisement placed by you.

Although the complaint made no specific allegations against you, the Commission has reason to believe that you may have violated 2 U.S.C. §434 for failure to file disclosure reports with the Commission.

The reporting requirements of §434 are detailed in 11 CFR §109 which sets forth the reporting requirements of persons or committees making independent expenditures on behalf of candidates for federal office. A copy of the Federal Election Campaign Act and Commission regulations are enclosed for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

Enclosures
Advertisement
Questions

83040411771

SENDER Complete items 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

1. The following service is requested (check one):
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery. \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *Powers*
735 E. Cedar B
St Paul, MN

3. ARTICLE DESCRIPTION: *55117*
REGISTERED NO. CERTIFIED NO. INSURED NO.
943466

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
K. L. Powers

4. DATE OF DELIVERY *26 Dec 78* POSTMARK

5. ADDRESS (Complete only if requested)
735 E Cedar B

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

U.S. POSTAL SERVICE

Advertisement placed by a group of individuals in the Catholic
Bulletin on behalf of Robert Short

("the Committee")

1. On what date was the Committee organized? By whom?
2. State the source of committee funds.
3. Detail the expenditures made to date by the committee.

9304041171

WE TRUST BOB SHORT

- To sponsor a HUMAN LIFE AMENDMENT and oppose public funding for abortion. (MCCL Newsletter, Nov. 1978)
- To resist diluting his advocacy of JUSTICE FOR THE UNBORN, unlike his I-R Opponent, David Durenberger, who appeared to risk such weakness by hosting GLORIA STEINEM and the DFL Feminist Caucus at his home in 1976. (St. Paul Sunday Pioneer Press, September 17, 1978)
- To provide consistent and UNCOMPROMISING LEADERSHIP for the protection of human life, unlike his I-R opponent who is courting the DFL Feminist Caucus. (The Wanderer, October 26, 1978)
- To raise his voice in the Senate for ALL THE ISSUES THAT RESPECT LIFE and promote justice for the powerless.
- To avoid costly and dangerous programs for social engineering, unlike his I-R opponent who actively solicited and received endorsement by AMERICANS FOR DEMOCRATIC ACTION. (St. Paul Sunday Pioneer Press, October 1, 1978)
- To be a TRUE AND LASTING FRIEND of the unborn, the elderly, the handicapped, ethnic minorities, and stable family life. (Short has donated free office space to St. Paul Birthright for three years.)

TRUST SHORT - VOTE FOR LIFE

Carol Wold — Democratic National Committeewoman

Kay Hatfield
J. Buford Johnson
Bill Engen

—Members of the DFL
State Executive Committee

and DFL Statewide Pro-Life National Delegates and Alternates
to the 1976 Democratic National Convention
and the 1978 Democratic Mid-Term Conference

Four Palatke
Leo Lander
Representative
Ed Schick
Barney Rosdoff

Kevin Powers
Mike Vukobrat
John Aasen
John
Joe Kennedy

Mary Frier
Ann Fowler
Paula Campbell
Paul
Lynn Vondra

Don Wornick
Leo Libser Jr.
J. Buford Johnson
Chas. Bove

PAID BY THE STATE OF MINNESOTA. This is a public document. It is subject to the provisions of the Minnesota Freedom of Information Act. It is not to be used for any purpose other than that for which it was prepared.

3.3.0.4.0.4.1.1.7.7

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Powers, Treasurer
735 E. Co. Rd. B.
St. Paul, MN 55117

RE: MUR 812(78)

Dear Mr. Powers:

The Commission has received a complaint from Paul Overgaard, chairman of the Durenburger for Senate Campaign, which included the enclosed advertisement placed by you.

Although the complaint made no specific allegations against you, the Commission has reason to believe that you may have violated 2 U.S.C. §434 for failure to file disclosure reports with the Commission.

The reporting requirements of §434 are detailed in 11 CFR §109 which sets forth the reporting requirements of persons or committees making independent expenditures on behalf of candidates for federal office. A copy of the Federal Election Campaign Act and Commission regulations are enclosed for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

*Instrument
Question*

*Sue
12/19/78*

3304041177

83040411776

TRIP 512 Alldor

PS Form 3811 Apr 1977

● SENDER Complete items 1, 2, and 3.
Add your address in the RETURN TO space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered _____
☒ Show to whom, date, and address of delivery _____
☐ RESTRICTED DELIVERY
Show to whom and date delivered _____
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: *Short*
8 Mendota
Minneapolis MN 55436

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943467

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
William Short

4. DATE OF DELIVERY POSTMARK
DEC 11 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Earl Short
8 Merilane
Minneapolis, MN 55436

RE: MUR 812(78)

Dear Mr. Short:

This letter is to notify you that the Federal Election Commission has received a complaint against your committee which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of 2 U.S.C. §434(b), §441b and 11 CFR 110.9(a).

A copy of the notification letter which has been sent to your committee is enclosed for your information. Please respond to the enclosed questions within 10 days after your receipt of this notification.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Complaint
Questions

33040411777

Robert Earl Short

1. Identify the individuals and/or committees you authorized to receive contributions or make expenditures on behalf of your 1978 senate campaign.
2. When did you, your principal campaign committee, or other agents have knowlege of the existence of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("the Just a Bunch Committee") and its proposed or actual activities on behalf of your election?
3. When did you, your principal campaign committee, or other agents have knowlege of the existence of the Employees of Bob Short Companies Committee ("the Employees Committee") and its proposed or actual activities on behalf of your election?
4. Identify all conversations and correspondence you or your campaign staff had with the Just a Bunch Committee or any of its officers, members, or agents, including the dates and content thereof and the parties thereto. This would include any requests by the Just a Bunch Committee for authorization by you and any conveyances of appreciation for the committee's efforts on your behalf.
5. Identify all conversations and correspondence you or your campaign staff had with the Employees Committee or any of its officers, members or agents, including the dates and content thereof and the parties thereto. This would include any requests by the committee for authorization by you, and any conveyances of appreciation for the committee's efforts on your behalf.

0304041177

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Earl Short
8 Merilane
Minneapolis, MN 55436

RE: MUR 812(78)

Dear Mr. Short:

This letter is to notify you that the Federal Election Commission has received a complaint against your committee which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of 2 U.S.C. §434(b), §441b and 11 CFR 110.9(a).

A copy of the notification letter which has been sent to your committee is enclosed for your information. Please respond to the enclosed questions within 10 days after your receipt of this notification.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

*Complaint
Gen. Counsel*

*File
12/9/78*

67111040433

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Just a Bunch of Plain DFL Folks
Who Want Common Sense Gov't
Employees of Bob Short Companies Committee
Short for Senate Committee of Volunteers
Democrats, Republicans, Independents United
for a Pro-Life Senate
R. E. Short Company

)
) MUR 812 (78)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 20, 1978, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated December 18, 1978, regarding the above-captioned matter:

1. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) their expenditures were made.
3. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceeded the limitations of that section.

Continued

33040411730

CERTIFICATION

MUR 812

First General Counsel's Report

Dated: December 18, 1978

Page 2

4. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
5. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements.
6. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
7. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
8. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceeded the limitations of that section.
9. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements.
10. Notify the Employees of Bob Short Companies Committee to amend its reports as follows:
 - a. file a summary page which would indicate the source of committee funds.
 - b. inform the Commission as to the disposition of the Committee's residual funds.

Continued

33040111731

CERTIFICATION

MUR 812

First General Counsel's Report

Dated: December 18, 1978

Page 3

11. Find reason to believe that the Bob Short for Senate Committee of Volunteers, the Just a Bunch Committee and the Employees Committee may have violated 11 CFR 110.9(a) by accepting contributions in excess of the limitations in 2 U.S.C. §441a.
12. Find reason to believe that the Short for Senate Committee of Volunteers and the R. E. Short Company may have violated 2 U.S.C. §441b by entering into a rental agreement for office space outside the ordinary course of business.
13. Find reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §441b by using corporate WATS lines for campaign purposes.
14. Find reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions.
15. Find no reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) by failing to report the payment of federal withholding taxes.
16. Find no reason to believe that either the Short for Senate Volunteer Committee or the Democrats, Republicans, and Independents United for a Pro-Life Senate may have violated 2 U.S.C. §434 for improperly reporting a transfer between the two committees.
17. Find reason to believe that Kevin Powers may have violated 2 U.S.C. §434 for failure to file disclosure reports.

Continued

33040411732

CERTIFICATION

MUR 812

First General Counsel's Report

Dated: December 18, 1978

Page 4

18. Authorize the postponement of a determination as to whether §441a(f) violations have been committed until the conclusion of an investigation of the above-mentioned violations.
19. Send the notification letters attached to the above-named report.

Attest:

12-20-78

Date

Margaret E. Chaney
for Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 12-18-78, 11:15
Circulated on 48 hour vote basis: 12-18-78, 3:00

83040411730

December 18, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812

Please have the attached First General Counsel's
Report on MUR 812 distributed to the Commission on a
48 hour tallybasis.

Thank you.

3304041173

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

78 DEC 18 P11: 15

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

DEC 18 1978

MUR # 812 (78)
DATE COMPLAINT RECEIVED
BY OGC 11/2/78

STAFF MEMBER Callahan

COMPLAINANT'S NAME: Paul Overgaard, Campaign Manager
Durenberger for Senate Campaign

RESPONDENT'S NAME: Just a Bunch of Plain DFL Folks Who Want Common Sense Gov't
Employees of Bob Short Companies Committee
Short for Senate Committee of Volunteers
Democrats, Republicans, Independents United for a Pro-Life
Senate

RELEVANT STATUTE: R. E. Short Company
2 U.S.C. §§ 433, 434(b), 441a, 441b, 441a(f), 441d
11 CFR 109.2(c) and 110.9(a)

INTERNAL REPORTS CHECKED: All respondent committees and the Durenberger for
Senate Campaign

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The complainant, Paul Overgaard, campaign manager of the Durenberger for Senate Campaign, alleges that the following violations have been committed in connection with Robert E. Short's senate campaign:^{1/}

1. That two committees, the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("The Just a Bunch Committee") and Employees of Bob Short Companies Committee (Employees Committee) placed advertisements supporting Bob Short for Senate with disclaimers indicating that the ads were not authorized by any candidate. The complainant contends that the expenditures for these advertisements could not be considered independent of the Short campaign within the meaning of 2 U.S.C. §431p, and that thus the advertisements were "authorized," placing both committees, their chairmen, and Bob Short and the Short for Senate Volunteer Committee in violation of 2 U.S.C. §441d.

2. That the Just a Bunch Committee and Employees Committee did not register with the Commission in a timely fashion in violation of 2 U.S.C. §433.^{2/}

^{1/} Paul Overgaard filed his original complaint with the Commission on November 2, 1978. The complainant submitted additional information and allegations on November 20, 1978 which are also addressed in this report.

^{2/} The complainant alleges a violation of §434 for failure to register with the Commission in a timely fashion. 2 U.S.C. §433 of the Act is the appropriate section which pertains to registration of political committees.

3. That "certain individuals" may have exceeded the contribution limitations of 2 U.S.C. §441a by contributing directly to Short's committees as well as to the Just a Bunch Committee and the Employees Committee.

4. That the Short for Senate Volunteer Committee transferred funds to Democrats, Republicans and Independents United for a Pro-Life Senate Committee a few days prior to the September 12th primary but did not report the transfer in a timely fashion in violation of 2 U.S.C. §434.

5. That the Short for Senate Committee of Volunteers failed "to report prompt payment of rent for its headquarters (owned by a Short-controlled corporation)" and failed to report federal tax withholding of staff payroll in violation of 2 U.S.C. §434.

6. That the Short for Senate Committee of Volunteers used corporate WATS lines in violation of 2 U.S.C. §441b.

7. That the respondents in this matter have committed knowing and willful FECA violations in violation of 2 U.S.C. §441a(f).

ANALYSIS

Just a Bunch of Plain DFL Folks Who Want Common-Sense Government Committee

The Complainant submitted advertisements which were placed by the Just a Bunch Committee supporting candidate Short and the "entire DFL ticket." The disclaimers read in part, "No candidates have authorized this ad." (All advertisements placed by the Just a Bunch Committee labeled as A).

It is the complainant's contention that since Donald Wozniak, chairman of the Just a Bunch Committee, consulted with Short about his campaign, was active in the activities of the campaign and contributed funds to the campaign, the expenditures by the committee could not be independent of the Short campaign.

As defined by 2 U.S.C. §431p, in order for an expenditure to be independent, it must be made "without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and not made in concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate."

In this particular situation the possibility arises that Wozniak, through his contacts with Short and Short's committee (as described by the complainant) acquired special knowledge of the candidate's needs, plans, and projects and used that knowledge to organize and advise the Just a Bunch Committee as to how to coordinate their activities on behalf of Short, thereby negating the independence of the committee.^{3/}

^{3/} See OR 769 and OR 777

If the Commission determines that the expenditures made by the Just a Bunch Committee were not "independent" as defined by §431p, then the expenditures would be regarded as in-kind contributions to the Short Committee and must be reported according to 2 U.S.C. §434(b).

The Complainant alleges a violation of 2 U.S.C. §441d has been committed by the Just a Bunch Committee by incorrectly placing non-authorization notices on its advertisements.

Although there is reason to believe that the committee could not make independent expenditures on behalf of Short's candidacy, it is not clear that the expenditures for the communications were authorized within the meaning of 11 CFR 110.11(a)(1)(i). An investigation of this issue will determine whether or not the advertisements were actually authorized by Short.

The Just a Bunch Committee registered with the Commission on November 2, 1978. The statement of organization indicates that the committee is a multicandidate committee supporting Robert Short and Wendell Anderson.

On October 28 and November 2 the Committee reported, via telegram, expending \$6,193.01 and \$14,195 respectively. The Committee did not report on behalf of which candidate(s) the expenditures were made, a violation of 11 CFR 109.2(c). If these expenditures are regarded as in-kind contributions, then the Just a Bunch Committee and the Short for Senate committee may have violated the limitations set forth in 2 U.S.C. §441a.

In light of the fact that the committee expended \$20,388 prior to the general election but did not register until November 2nd, the question is raised as to whether the committee registered with the Commission in a timely fashion. 2 U.S.C. §433 requires political committees to file a statement of organization with the Commission "within 10 days after its organization or, if later, 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000." Due to the fact that the Committee placed radio and newspaper advertisements prior to the election and received over \$20,000 in contributions, it appears that the organization of and/or the receipt of funds in excess of \$1,000 may have occurred before October 23rd thus placing the committee in violation of 2 U.S.C. §433.

The Employees of Bob Short Companies Committee

The complainant also submitted an advertisement (Attachment B) which was placed by the Employees Committee supporting Short for Senate. The disclaimer which accompanied the advertisement indicated it was not authorized. The complainant alleges that because Oscar Molomot, chairman of the Committee, was reimbursed for expenses by the Short Committee, the expenditures for the advertisements could not have been independent. 11 CFR 109.1(b)(4)(i)(B) states that an expenditure is not independent

if it is "made by... any person... who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent". Reports filed by the Short for Senate Volunteer Committee indicate that on October 10, 1978, Molomat received \$170.27 in reimbursement for "travel, food, mileage, press, room rentals and photos" from Short's committee. Therefore, the Employees Committee expenditures would be considered in-kind contributions to Short's campaign placing both committees in violation of 2 U.S.C. §434(b) for incorrectly reporting their activities and in violation of 2 U.S.C. §441a for exceeding the \$1,000 contribution limitation set forth in the Act.

The Complainant alleges a violation of 2 U.S.C. §441d has been committed by the Employees Committee by incorrectly placing non-authorization notices on its advertisements.

Although there is reason to believe that the committee could not make independent expenditures on behalf of Short's candidacy, it is not clear that the expenditures for the communications were authorized within the meaning of 11 CFR 110.11(a)(1)(i). An investigation of this issue will determine whether or not the advertisements were actually authorized by Short

The Employee's committee filed a statement of organization on November 6, 1978. The registration form indicates that the committee is an unauthorized single candidate committee.

On November 2, 1978, via telegram, the committee notified the Commission that it had expended \$3,648 in support of candidate Short.

The committee filed a report on November 6, 1978 which covered the period October 18 through November 2 indicating that the committee was organized and receiving funds as early as October 18 and therefore did not register in a timely fashion in violation of 2 U.S.C. §433. The committee report is marked as a 30 day post general election report and a termination report. It is recommended that the committee be notified to file a summary page which would indicate the source of committee funds and inform the Commission "as to the disposition of residual funds pursuant to 11 CFR 102.4.

Certain individuals may have exceeded contribution limitations

As set forth in 2 U.S.C. §441a(a)(1)(A), an individual may not contribute more than \$1,000 per election to a federal candidate. Contributions made either directly or indirectly on behalf of a particular candidate, are considered contributions to that candidate. 2 U.S.C. §441a(a)(8).

The provisions of §441a are clarified in §110.1(h) of the Commissions regulations which state that a person may contribute to a candidate and also contribute to a political committee supporting

the candidate so long as (1) the political committee is not an authorized committee of the candidate or a single candidate committee supporting only that candidate; (2) the contributor does not give with knowledge that a substantial portion will be contributed to or expended on behalf of that candidate; and (3) the contributor does not retain control over the funds.

Thus, an individual would be permitted to contribute only \$1,000 per election to either Bob Short, one of his authorized political committees, the Just a Bunch Committee, the Employees Committee or any other committee supporting only Bob Short's candidacy since contributions to a single candidate political committee are clearly made "on behalf of" the candidate supported by the Committee.

It is recommended that the Just a Bunch Committee and the Employees Committee be requested to provide the Commission with detailed contributor information in order that a determination can be made as to whether violations of §441a have been committed by any individuals.

Short for Senate Committee of Volunteers

The complainant alleges that the Short for Senate Committee of Volunteers has failed to report prompt payment of rent for its headquarters which is owned by a "Short-controlled corporation."

Review of the committee's reports indicate that rental payments for office space have been paid by the Committee to the Bowman Corporation, the Fifth DFL Senatorial District, and the R. E. Short Company. The reports indicate that one rental payment was made to the R. E. Short Company on October 10, 1978, in the amount of \$2,400. It is not clear from the committee reports what period of time the \$2,400 payment covered. If the R. E. Short Company made special arrangements for rental payments by the committee which were not in the ordinary course of business, a corporate contribution may have occurred placing both the committee and the R. E. Short Company in violation of 2 U.S.C. §441b.

The complainant further alleges that the committee used corporate WATS lines in connection with Short's campaign. The complainant did not detail the allegation. If the committee did use corporate WATS lines, a violation of 2 U.S.C. §441b may have been committed by the committee as well as by the corporation which allowed the campaign to use its lines.

The complainant also alleges that the committee has failed to report federal withholding taxes of staff payroll. A review of committee records indicates that federal withholding taxes have been paid by the committee in the amount of \$2,438. There is no reason to believe that the committee has failed to report payment of federal withholding taxes.

Short for Senate Committee of Volunteers and Democrats, Republicans and Independents United for a Pro Life Senate

The complainant alleges that the Short for Senate Committee transferred \$40,000 to Democrats, Republicans and Independents Committee a few days before the primary election but did not report the transfer until after the election in violation of 2 U.S.C. §434.

Both committees reported the transaction on their October 10 reports as occurring on September 6, 1978. Since the pre primary election report coverage dates closed on August 28th, both committees correctly reported the transfer on the next required report, that report being the October 10 quarterly report covering August 29 through September 30th.

Knowing and Willful Violations

The complainant alleges that the respondents in this case have committed knowing and willful violations. It is recommended that an investigation be conducted prior to making a determination of whether a violation of 2 U.S.C. §441a(f) has been committed.

Catholic Bulletin Advertisement

The Complainant also submitted an advertisement which was placed in the Catholic Bulletin on behalf of Bob Short by 19 individuals, Kevin Powers acting as treasurer. The group does not list a committee name on the advertisement's non-authorization notice and has not filed with the Commission. (labeled C).

The complainant does not make any allegations regarding the above-mentioned advertisement.

It is recommended that the Commission find reason to believe that Kevin Powers has violated 2 U.S.C. §434 for failure to file with the Commission.

RECOMMENDATION

1. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) their expenditures were made.

3. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceeded the limitations of that section.

4. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.

5. Find reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements.

6. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.

7. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.

8. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceeded the limitations of that section.

9. Find reason to believe that the Employees of Bob Short Companies Committee may have violated 2 U.S.C. §441d for failure to provide an appropriate disclaimer on its advertisements.

10. Notify the Employees of Bob Short Companies Committee to amend its reports as follows:

a. file a summary page which would indicate the source of committee funds.

b. inform the Commission as to the disposition of the Committee's residual funds.

11. Find reason to believe that the Bob Short for Senate Committee of Volunteers, the Just a Bunch Committee and the Employees Committee may have violated 11 CFR 110.9(a) by accepting contributions in excess of the limitations in 2 U.S.C. §441a.

12. Find reason to believe that the Short for Senate Committee of Volunteers and the R. E. Short Company may have violated 2 U.S.C. §441b by entering into a rental agreement for office space outside the ordinary course of business.

13. Find reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §441b by using corporate WATS lines for campaign purposes.

14. Find reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions.

15. Find no reason to believe that the Short for Senate Committee of Volunteers may have violated 2 U.S.C. §434(b) by failing to report the payment of federal withholding taxes.

16. Find no reason to believe that either the Short for Senate Volunteer Committee or the Democrats, Republicans, and Independents United for a Pro Life Senate may have violated 2 U.S.C. §434 for improperly reporting a transfer between the two committees.

17. Find reason to believe that Kevin Powers may have violated 2 U.S.C. §434 for failure to file disclosure reports.

18. Authorize the postponement of a determination as to whether §441a(f) violations have been committed until the conclusion of an investigation of the above-mentioned violations.

19. Send the attached notification letters.

ATTACHMENTS

- I Complaint dated October 31, 1978
- II Complaint dated November 15, 1978
 - A. Just A Bunch Committee advertisements
 - B. Employees Committee advertisement
 - C. Catholic Bulletin advertisement

Notification letters to:

- III Just a Bunch Committee
- IV Employees Committee
- V Short for Senate Committee
- VI Robert Short
- VII R.E. Short Company
- VIII Democrats, Republicans and Independents Committee
- IX Kevin Powers (Catholic Bulletin ad)

3304041172

DURENBERGER FOR U.S. SENATE

Suite 164, 8120 Penn Avenue South, Minneapolis, Minnesota 55431 612/888-1244

October 31, 1978

Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

807570

Dear Sir:

This is a complaint under 2 U.S.C. 437g of the Federal Election Campaign Act of 1971, as amended, against Bob Short, the Short for Senate Committee, Mr. Donald D. Wozniak, and the so-called Just a Bunch of Plain Folks Who Want Common Sense Committee, and the so-called Employees of Bob Short Companies Co.

The enclosed newspaper advertisement appeared in the Minneapolis Tribune on October 29, 1978. The advertisement's notice of authorization falsely and misleadingly claims that it was placed by an independent political committee and not authorized by candidate Short. I understand that last-minute negative radio advertising has also been prepared with the same false and misleading disclaimer.

In fact, "D.D. Wozniak, Chairman" of the "Just a Bunch..." committee is Mr. Donald D. Wozniak, 303 Woodlawn Avenue, St. Paul, Minnesota. Mr. Wozniak is a close personal friend of candidate Short, has consulted frequently with Short about the campaign, is active in activities of the Short for Senate Committee, contributed at least \$1500 to the Short for Senate Committee, and... as shown by the enclosed newspaper article--has been a major public organizer of the Short Committee.

The "Just a Bunch..." committee is not in fact independent of the Short Committee and because of Mr. Wozniak's involvement cannot be considered "independent" within the meaning of the Federal Election Campaign Act. The facts in this case are the same as in MUR 321 (November 2, 1977) involving Mr. Peter F. Secchia's activities on behalf of the President Ford Committee. In MUR 321 Mr. Secchia was fined by the Federal Election Commission for his illegal activities.

Additionally, on October 30, 1978, the enclosed newspaper advertisement appeared in the Minneapolis Star with a false and misleading disclaimer suggesting that it was placed by a group called "Employees of Bob Short Companies" independent of the Short for Senate Committee. This is not an independent committee but just another front group for candidate Short. The supposed chairperson of the "Employees" committee is Mr. Oscar Molomot; on October 10, 1978, according to FEC records, Mr. Molomot received reimbursement for expenses from the Short Committee. Federal law prohibits a person who "has been receiving any form of compensation or reimbursement from the candidate's committee" from making independent expenditures. 11 C.F.R. 109.1 (b) (4) (B)

Short's activities involve violations not only of the notice of authorization requirements (2 U.S.C. 441d) but also the registration requirements of 2 U.S.C. 434 because -- despite expenditures far in excess of \$1000--neither the "Just a Bunch..." committee nor the "Employees" committee filed registration statements with the Federal Election Commission as of October 31, 1978.

It is also likely that certain individuals exceeded the contribution limitations of 2 U.S.C. 441a because contributions to the "Just a Bunch..." and "Employees" committee must be added to other direct contributions to the Short Committee.

3304041179

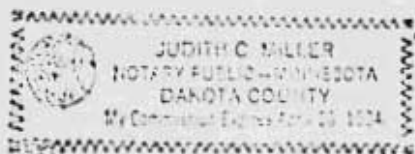
The FEC should immediately investigate these violations and the true source of the funds the "Just a Bunch..." and "Employees" committees are spending on their last-minute advertising campaign.

Mr. Short has already loaned his authorized committee well in excess of one million dollars. Documents now on file and in the public record at the FEC and Secretary of State's Office show that Short's own committee transferred \$40,000 to a group calling itself "Democrats, Republicans and Independents United for a Pro-Life Senate" just a few days before the September 12th Primary election but did not report the transfer until after the Primary election.

Short is now trying the same last-minute tactics by using his "Just a Bunch..." committee as a front group.

The repeated nature and pattern of these violations indicates that they are knowing and willful and therefore in violation of 2 U.S.C. 441a (f).

The people of Minnesota have the right to know how much money Mr. Short is funnelling into his supposedly independent committees before the General election; the Federal Election Campaign Act clearly requires Short to make such disclosures; and the FEC is empowered and required to commence its investigation expeditiously under 2 U.S.C. 437g.



Subscribed and sworn to before me
on this 1st day of Nov., 1978.

Judith C. Miller

Sincerely,

Paul Overgaard

Paul Overgaard
Campaign Manager

ies stir hottest Several s in District 64B DFLers back Short

Dispatch
9/5/78

endorsements from most major labor unions.

But, the biggest difference, Byrne said, is that she has changed her style as a legislator.

"I'm not introducing so many bills any more," she explained. Instead, she is concentrating on "constituent services" — helping residents deal with state agencies, trying to get state programs into the district, acting as a spokesman at public hearings and attending "as many community meetings as possible."

BYRNE, in effect, has been campaigning for two years. "Elections are won in non-election years," she said.

Nonetheless, DFL strategists said Byrne could be in trouble. The reason is Zasada's effort to portray her as too liberal for the district.

"It's true, she hasn't introduced as many poofy bills as she used to, but she still has the same philosophy," the challenger said. "She is a naive, immature ultra-liberal. I am a conservative Democrat."

Byrne said, "There is no doubt he is coming off as an ultra-conservative, but there's no way I'm ultra-liberal. My views are moderate. They reflect those of my district — conservative on moral and social issues but hardly conservative on economic issues. We believe some of this country's wealth should be distributed to low and middle-income people."

TO SHOW HE is more conservative on abortion, Zasada said, "I have been in the pro-life movement from the start. Byrne claims she is pro-life, but she isn't with her pro-life organizations. I think that indicates

See Short, Page 18

By GARY DAWSON
Staff Writer

Cailling Edina businessman Bob Short the DFLer who can best deal with issues of inflation and moral decay, several prominent Democrats, including former Gov. Karl Rolvaag and St. Paul Councilwoman Rosalie Butler, urged the election of Short over Congressman Donald Fraser in the Sept. 12 DFL U.S. senatorial primary.

AMONG THOSE appearing at a press conference to boost Short's chances and place yet another roadblock in Fraser's DFL party-endorsed effort to win the DFL nomination for the Senate seat vacated by Hubert Humphrey, were:

Rolvaag; Butler; Former Secretary of State Joseph Donovan; former state legislator D. D. (Don) Wozniak; Ramsey County director of property taxation Lou Meltema and former state legislator Peter S. Popovich.

It was well known they and several other well-known DFLers were backing Short. Why did they wait until now to back him publicly?

"I THINK this is the appropriate time to do it," said Rolvaag of the timing designed to make voters aware that the primary will be held just a week from Tuesday. "I think he (Short) is going to win."

Rolvaag thus comes back once again to haunt the DFL Party which denied him endorsement to run for a second term as governor in 1976. Rolvaag took the battle to the primary and won the party nomination, but with a

See Short, Page 18

Byrne Zasada
that tactic two years ago, it almost worked.

ZASADA, 204 Edmund Ave., one within 149 votes of unseating Byrne in a four-way DFL primary in 1976. The incumbent, in her second term, received narrow 42 percent plurality in a contest.

Two years ago, the three challengers had similar, conservative social views, and they split the conservative vote, according to Zasada.

"It's true," he said, "it's a party issue, and I think I'll get most of the votes that went to

Section 70

Other challenger gets in 1976. People who voted for them are my views."

Byrne, 504 Van Buren Ave., "that is wishful thinking."

"I HAVE LEARNED some lessons, and things have changed," asserted the 30-year-old full-time law teacher and part-time graduate student. "I am in much stronger position this year."

The change is that she has DFL endorsement, something she lacked in 1976. She also has



GAY RIGHTS is one moral issue on which they disagree — and Byrne is out of tune with the district, Zasada said. He opposed the St. Paul gay rights ordinance, and the district voted 2 to 1 to repeal that ordinance last spring.

Byrne said she supports gay rights "as a matter of principle, because I believe all persons are entitled to basic human rights."

But gay rights is a "dead issue," she said. After the St. Paul referendum, "there is no

of a federally funded job with the state Agriculture Department. Although he is on leave during the campaign, he still has that job in the state elm wood disposal program. If he had signed up while living in St. Paul he would have been limited to one year in the job.

Zasada said he sees nothing wrong with that. He moved to Roseville for personal reasons before he learned about the job and he returned to his St. Paul home after resolving his problems. He did not change his residence just to keep the job longer, he asserted.

district is one of the staunchest DFL strongholds in the state.

Short

Continued from Page 17

divided party lost the general election to a Republican, Harold LeVander.

Rolvag's running mate back in those stormy days when the party that this year endorsed Fraser turned its back on a sitting governor?

NONE OTHER than Short, who as a lieutenant governor candidate backed Rolvag. And it was Fraser who gave the nominating speech for A.M. Sandy Keith who took the DFL endorsement away from Rolvag.

Rolvag struck back as early as 1972 when he beat the party's endorsed candidate for public service commissioner and went on to be elected.

Rolvag's estimation that Short will whip Fraser Sept. 12 is based on an analysis of the state's eight congressional districts and, as Rolvag told reporters "a little experience." Rolvag said his travels throughout the state as a Short booster show Short taking the 5th and 7th congressional districts in northern Minnesota; leading slightly in the 2nd District in southern Minnesota; winning the 4th District, which includes Ramsey County, and currently having the edge in the 6th District in western and southwestern Minnesota (although Rolvag said it had been considered a "long up").

ROLVAG commands the 5th District in Hennepin County, the 3rd District consisting of western Twin Cities suburbs and the 1st District in southeastern Minnesota to Fraser.

SOLVE THE MIP

YOU CAN WIN \$150!

TODAY'S CLUE...
A number and a trail paid off
at the box office.



Find the words in the grid
that correspond to the clues.

TODAY'S
WORD

IT'S TIME TO PLAY...
SOLVE THE MIP

The MIP is a word search puzzle that is played every day in the Minneapolis-St. Paul area. It is a fun and challenging game that can be played by anyone. The puzzle is based on a grid of letters, and the player's task is to find words hidden within the grid. The words can be horizontal, vertical, or diagonal. The puzzle is a popular pastime for many people, and it is a great way to test your word-finding skills.

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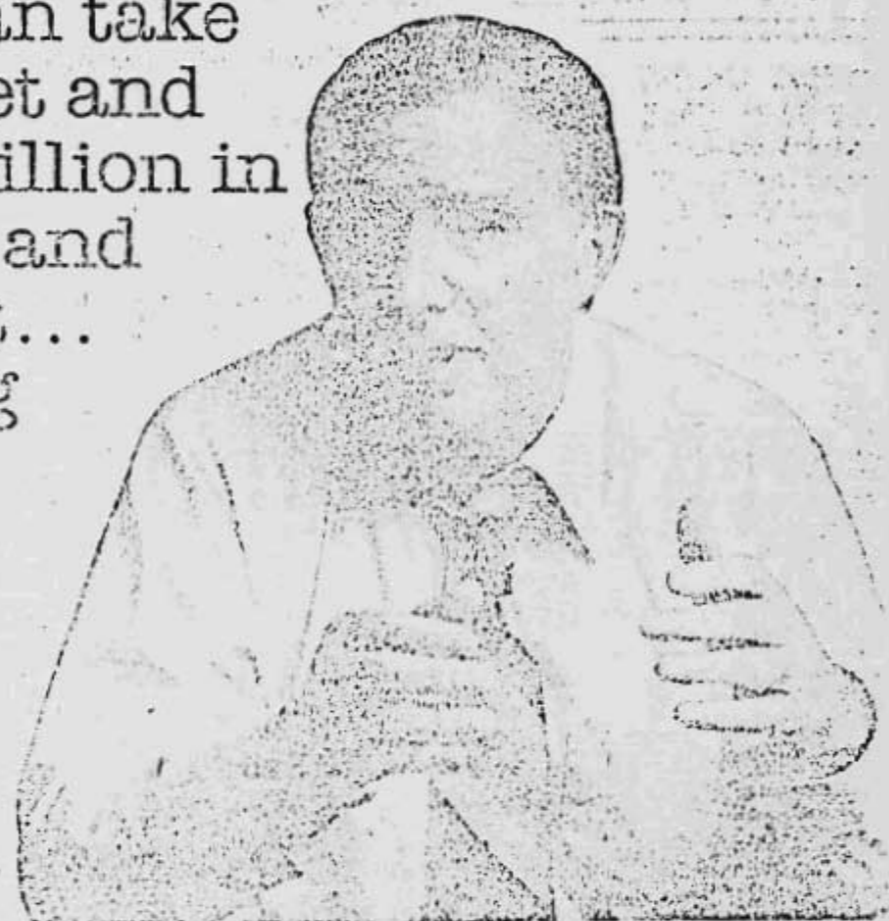
2 3 0 4 0 1 1 7 2 5

"There's lots of talk about inflation these days. Lots of talk. And precious little action.

"I've been doing more than talking. I have proposed a permanent, across-the-board federal spending cut of \$100 billion. I propose that \$50 billion go to cut the inflationary federal deficit ... and \$50 billion be returned to you, the people.

"My Republican opponent says this can't be done. He probably couldn't do it. He has no experience in business management, little experience in government

"I've spent a lifetime in government and business. And I assure you that any good manager can take the federal budget and eliminate \$100 billion in fraud, waste and mismanagement... without affecting essential programs."



Bob has already documented how the budget cut can be realized. For a copy, send \$1.00 to cover handling and mailing to: Short for Senate Committee, 1011 Marquette Ave., Minneapolis, MN 55403.

DEF./LABOR

BOB SHORT FOR SENATE

DURENBERGER FOR U.S. SENATE

II

Suite 164, 8120 Penn Avenue South, Minneapolis, Minnesota 55431

612/888-1244

6004

3635

November 15, 1978

Mr. Lester W. Scall
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Scall:

I hereby submit additional information relating to my complaint dated October 30, 1978.

The enclosed newspaper advertisements were placed by the "Just a Bunch" Committee in the last few days before the November 7th election. The "Just a Bunch" Committee falsely claimed to be independent. The newspaper advertising cost approximately \$20,000.

In addition, the "Just a Bunch" Committee spent several thousand dollars on misleading advertising on radio stations WLOL and WCCO in Minneapolis.

Despite these extensive expenditures, no Statement of Organization was filed with the FEC until November 6th. The "Just a Bunch" Committee failed to report expenditures in excess of \$1,000 in violation of 11 C.F.R. 109.2(c) and appears not to have reported such expenditures even as of today's date.

These are significant and not merely technical violations because of the large amount of money spent and the knowing and willful effort to create the false impression that the expenditures were independent. Investigation of the circumstances and persons involved in the preparation and recording of the radio advertising will confirm that the "Just a Bunch" Committee can in no way be considered independent of the Short Committee.

807910

Mr. Lester W. Scall
November 15, 1978
Page (2)

Additionally, I enclose a newspaper article from the Minneapolis Tribune wherein Mr. Wozniak, Chairman of the "Just a Bunch" Committee admits that his group was actually organized at a fundraising event sponsored by the Short Committee!

Finally I enclose a newspaper advertisement placed in The Catholic Bulletin which also purports to be independent despite Mr. Wozniak's involvement.

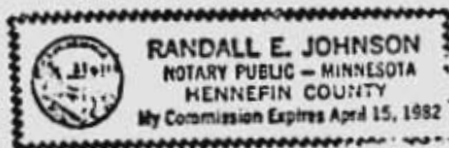
These facts show a repeated pattern of knowing and willful violations by Mr. Short, Mr. Wozniak, and their various front groups. Further investigation by the FEC should include the failure of the Short Committee to report prompt payment of rent for its headquarters (owned by a Short-controlled corporation), failure to report federal tax withholding of staff payroll, use of corporate WATS lines, and other serious violations.

Sincerely,

Paul P. Overgaard

Paul P. Overgaard

Subscribed and sworn to before
me this 15 day of November, 1978.



4B.

Committees Continued from page 2B

ally associated with the Short campaign, or that they are receiving any funding from Short or his campaign committee. They also said that the 10-day period for them to register with the FEC has not yet elapsed.

Fred Gates, manager of the Short campaign, denied any formal connection between the Short committee and the two groups. Gates also suggested that the Minnesotans for Honesty in Politics may not be very independent of Durenberger, an Independent-Republican.

The group consists largely of liberal DFLers who were upset by Short's primary election victory over U.S. Rep. Donald Fraser, who was the DFL endorsee for the Senate seat now held by Muriel Humphrey. About two weeks ago, they launched a "Stop Short" effort.

With the general election just six days away, Durenberger and Short are locked in a tight contest. The Minneapolis Tribune's most recent Minnesota Poll two weeks ago showed them even.

Overgaard told reporters yesterday that Short has a history of setting up and funding phony committees. He cited the case of a group called "Democrats, Republicans and Independents United for a Pro-life Senate," which circulated anti-Fraser leaflets on the final weekend before the Sept. 12 primary election.

He said this group did not register until a few days before the primary and did not disclose until after the primary that all but \$35 of its \$40,035 in contributions had come from the Short campaign.

Overgaard said that Short and his campaign have direct ties to the "Just a Bunch of Folks" committee and the "Employees of Bob Short" committee, both of which have published advertisements in Short's behalf in recent days.

He said former state Rep. D.D. Wozniak of St. Paul, chairman of the "Just a Bunch of Folks" committee, is a close friend of Short who has been active in the Short campaign and has contributed at least \$1,500 to it.

He said that Oscar Molomot, chairman of the "Employees" committee, is a top assistant of Short who previously received reimbursements from Short's committee for expenses incurred while working on the Short campaign.

Overgaard suggested that these two committees could be used for the same kind of "last-minute smears" that were made by Short backers against Fraser in the primary. "Given the history of Bob Short," he is

the season for unusual campaign activity," he said.

Wozniak said in response that his committee "has absolutely no connection with Short or his committee. It has received absolutely no money from Short or his committee."

He said a group of Short's supporters got the idea of forming the committee while chatting at a Short fundraising event last Wednesday in St. Paul. He said members of the group "just thought the Short campaign wasn't bringing forth some facts that should be brought forth."

According to Wozniak, the group's members include former Gov. Karl Rolvaag, former state Rep. Peter Popovich of St. Paul and Mike McLaughlin, DFL chairman in the Fourth Congressional District.

(Short ran for lieutenant governor as Rolvaag's running mate in 1966 after the party rejected Rolvaag in favor of Lt. Gov. A.M. Keith. Rolvaag and Short won the DFL primary, but lost in the general election.) Molomot, Short's publicist and personal assistant for the last 18 years, said he got the idea of forming the "Employees" committee for Short and enlisted the aide of H. P. Traun, vice president of sales for Short's truck line, Admiral-Merchants Motor Freight, Inc.

He said more than 500 employees signed their names to the advertisement and contributed to pay for it. The ad defended Short's record as an employer, a record that has been attacked by several labor unions.

A college student who had been on the payroll of Short's Leamington Hotel until last week told the Tribune that employees were called to a meeting one afternoon, told about Molomot's intention to run the ad, and asked to sign a slip of paper authorizing the use of their names. The employees also were asked to contribute \$10, \$5, \$2 or some other amount, he said.

The student said all of the hotel supervisors were at the meeting and many employees "were kind of afraid that if they didn't pay the money or sign the paper, they might lose their job."

Molomot denied that the employees were pressured in any way. He said many of the employees who gave their names and money "have been with him (Short) for the 28 years he has been in the trucking business or the 13 years he has been at the Leamington."

Late in the day, Gates held a news conference to respond to Overgaard and to charge that Minnesotans for Honesty in Politics had failed to register with the FEC within the required time period.

Mary Grace Flannery, Minneapolis, treasurer for the group, denied the charge. Flannery said she mailed the group's registration on Oct. 24 and mailed its first financial disclosure report on Oct. 26. She said the report disclosed that her group had raised \$5,662 and spent \$2,912 as of Oct. 24, the end of the most recent reporting period.

Durenberger aide: Groups backing Short are only fronts

By Steven Dornfeld
Staff Writer

David Durenberger's campaign manager charged Tuesday that two so-called "independent" committees supporting fellow Senate candidate Robert Short are not really independent.

Paul Overgaard, manager of the Durenberger campaign, said that groups calling themselves "Just a Bunch of Plain Folks Who Want Common Sense Government" and "Employees of Bob Short Companies" are front organizations for the DFL Senate candidate.

Overgaard said neither group has registered with the Federal Elections Commission (FEC) or disclosed its funding sources. He said the Durenberger campaign has formally asked the FEC to investigate the two groups, their apparent ties to Short and their funding sources.

Leaders of the two committees immediately denied that they are for-

Committees continued on page 4B

A

THEY'RE MAD AT YOU

As you read the rantings of the supposedly neutral metropolitan press, and listen to the wailings of the party power brokers, you get the impression that they're mad at Bob Short.

But they're not really mad at him at all. They're mad at you!

They're mad at you for not letting them hand-pick the next senator from Minnesota.

They're mad at you because you selected a man they know they can't control.

They're mad at you because you voted for lower taxes and less bureaucracy, which they're afraid will threaten some of their costly pet projects.

They're mad at you for voting what they say are your "special interests." What that really means is that you voted for your interests rather than theirs.

And finally, they're mad at you simply because they're elitists, who feel they're better equipped to select your candidates than you are.

So they're mad. Mad that you didn't listen to them on September 12. And you know what... they're going to be even madder when you don't listen to them on November 7.

VOTE FOR BOB SHORT AND AND SENATE BILL MCNULTY

MINNESOTA SENATE BILL MCNULTY

offer health records

3.4. Learning Systems

The following pattern is a mixture of a simple and complex sentence. The *if* clause is principal and the main clause is subordinate and the main clause is the result of the *if* clause.

to read three volumes for the author and graduate student. The first is an excellent history of the United States which provides the background for the other two.

There are also Billy Zane, Joe Lando, Anthony Quinn and Billy Barty with Williams' mother-in-law. Don't miss out if it's a show you're in. At Southwestern Bell Bank, it will be held a political event. It's a show that's making it a show for the people.

There was no response from either

While medications have made a difference, we need health education to prevent the long-term use of a crutch. There is no one answer that they make pain less. There is a lot of work to do.

The APN will be conducting her first health fairs this summer, with a focus on the elderly and women. She will be providing health screenings and offering information on various health services.

Source: The Bureau, Amsterdam and Brussels, estimated a minimum of 100,000 to be present.

Summary

Frangula is a large, perennial shrub or small tree 8 to 20 ft. high, with all leaves, but a thick covering of 1/2 inch to 1/4 inch and a bark of 1/4 inch and appeared to be "in flower and fruit" at least.

[illegible][illegible]

Participants were recruited by telephone to participate in a study. Those who were eligible were invited to participate in the study. The study was approved by the Institutional Review Board of the University of Illinois at Chicago.

1998, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 26

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During the first week of the Latvian independence in 1918, Duke Oskars was the Commander-in-Chief of the Latvian Army, and later the Secretary of the Ministry of the Interior. He was also the first Governor of Latvia. He was born in 1874 in the village of Karkava, Latvia. He was a member of the Latvian nobility and was a close friend of the Latvian independence movement. He was killed in 1941 by the Germans. His remains were found in 1991 and were reburied in the Riga Central Cemetery. He was posthumously awarded the Order of the Three Stars in 1991.

The *Monrovia Star* and Tribune might show early, since October 27 and will not print it... as we will.

[illegible]

In 1972, the Public Examiner attempted to determine if the cash payments were proper. The audit papers conclude:

"It was not possible to verify annual wages earned by the farm community and since the personnel files of the Georgia Land Office staff had been destroyed at the end of the administration, according to Hasty, there is no way the wages were determined and should not be given in the farm grant's review when the new administration took office."¹³

DOI: 10.1002/for

*... no public record shall be destroyed without the approval of the commission in accordance with Minnesota Statutes 138.11 to 138.13."

Minnesota Statute 13.17 requires all bills to

"...make and keep all records necessary to a full and accurate knowledge of their allist activities."

Minnesota Statute 15.17, Sub. 2 includes the cited administrative effort.

"... to carefully protect and preserve public records from deterioration, mutilation, loss or destruction."

Manuscript accepted 19 April 2004

"... every local custodian of public records at the expiration of his term of office or authority ... shall deliver to his successor in office all public records in his custody."

These statistics were not available in 1974. The calculation of these records is a direct application of the Minnesota Law. The records are not available in 1974.

The authors of the 1992 study, though, suggest that authoritarianism was increased simply to achieve large numbers, something in the last wave of the 1970s authoritarian administration and then to deliberately "destroy" the results as a counterexample.

It appears to us that there is no high impact, national reporting on the Inuit. Don't forget race. Rest assured, had Bob Shriver acted in a manner — the story would have been written, and appeared on page 1.

Why won't the Star and Tribune print this news story? Ask them: 312-4141.

THE UNIVERSITY OF CHICAGO

The Minneapolis Star and Tribune criticized Bob Short for putting his own money into his campaign.

But, they don't mention much about the hundreds and hundreds of thousands of dollars of special interest money their candidate Durenberger has taken.

**Bob Short owes a lot to the people of Minnesota.
Durenberger owes a lot to:**

(The following is a partial list of the special interest contributions to the Durenberger campaign. As of this date, \$300,000 dollars in contributions have been received.)

- ** Owen Oil Co. PAC
Los Angeles, California
- ** American Oil Co. PAC
Chicago, Illinois
- ** Del Norte PAC
San Francisco, California
- ** Professional Agents PAC
Alexandria, Virginia
- ** General Mills PAC
Minneapolis, Minn.
- ** Restaurants PAC
Washington, D.C.
- ** Union Carbide PAC
New York, New York
- ** W. Cen. Texas PAC (Fuels)
Arlene, Texas
- ** CERAC
Golden, Colorado
- ** Fed. Childrens Res. Co.
Rosemead, California
- ** MIAA PAC (Dow Chem.)
Midland, Michigan
- ** Western S&P PAC
Fl. Wynn, Texas
- ** HUPAC (Dow Chem.)
Midland, Michigan
- ** One Indus. PAC
Gen. Motors
Detroit, Michigan
- ** Lynx PAC
Beverly Hills, California
- ** ALCOA PAC
Pittsburgh, Penn.
- ** LNS PAC
Dayton, Ohio
- ** Am. Dental PAC
Washington, D.C.
- ** FLO PAC
Trompsville, Michigan
- ** BROVAC
Lenoir, North Carolina
- ** U.S. Unions PAC
Washington, D.C.
- ** Eron PAC
Cleveland, Ohio
- ** Binkway Glass PAC
Brooklyn, Pennsylvania
- ** Am. Medical Assoc. PAC
Chicago, Illinois
- ** Ford Motor Co. PAC
Dearborn, Michigan
- ** Tex. Texas PAC (Fuels)
Wichita Falls, Texas
- ** Southern United Gas. Comm.
Miami, Florida
- ** Western Union PAC
St. Paul, Minn.
- ** South and Am. PAC
Dallas, Texas
- ** Jones Fund Comm.
Chicago, Illinois
- ** Bankers PAC
Houston, Texas
- ** Engineers and PAC
Washington, D.C.
- ** Campaign America PAC
Washington, D.C.
- ** United Tech. Corp. PAC
Hartford, Conn.
- ** CIO PAC
Washington, D.C.
- ** Ryan PAC
New York, New York
- ** Comm. for Accounting Gen.
Dubuque, Iowa
- ** Edison Electric PAC
Washington, D.C.
- ** Union Camp PAC
Wayne, New Jersey
- ** Sun Oil Co. PAC
Richmond, Penn.
- ** Nonpartisan Comm. PAC
Atlanta, Georgia
- ** Scatter Chemical PAC
Westport, Conn.
- ** Auto & Truck Dealers PAC
McLean, Virginia
- ** Comm. for Through
Agricultural Education
San Antonio, Texas
- ** Daimler-Benz PAC (Fuels)
Dallas, Texas
- ** Elanco PAC
Palo Alto, California
- ** Bristol-Myers PAC
New York, New York
- ** American Can Co. PAC
Greenwich, Conn.
- ** Duxbury Corp. PAC
Minneapolis, Minn.
- ** W. M. C. PAC
Houston, Texas
- ** W. M. C. PAC (Fuels)
Tulsa, Texas
- ** Republic Steel PAC
Washington, D.C.
- ** Community Futures PAC
Chicago, Illinois
- ** Tri-Sun PAC (Fuels) Ltd.
Evansville, Indiana
- ** Parkville Energy PAC (Petrol)
Amarillo, Texas
- ** HOUTAC (Fuels)
Houston, Texas
- ** MAPCO PAC (Fuels)
Tulsa, Oklahoma
- ** Central Soda PAC
Fl. Wayne, Ind.
- ** Life Underwriters PAC
Washington, D.C.
- ** Ed. Kelly Co. PAC
Ind. Indiana
- ** Galt Oil Co. PAC
Los Angeles, Calif.
- ** BANCO PAC
Minneapolis, Minn.
- ** Citizens for the Republic
Santa Monica, Calif.
- ** DARTAC
Los Angeles, Calif.
- ** Vol. Comm. for Gen.
Washington, D.C.
- ** Tooling Machine Ind. PAC
Washington, D.C.
- ** Gould-Burner PAC
Rolling Meadows, Ill.
- ** Rep. Cong. Bookers Club
Washington, D.C.
- ** Cargill PAC
Wayzata, Minn.
- ** George Pacific Employees Fund
Portland, Oregon
- ** Comm. for Effective Gov.
Geneva, Illinois
- ** PETRAC (Fuels)
Tyler, Texas
- ** Ashland Oil Co. PAC
Ashland, Kentucky
- ** Crown PAC
San Francisco, Calif.
- ** Honeywell PAC
Minneapolis, Minn.
- ** Atty. Congressional PAC
Washington, D.C.
- ** Nat. Republican Sen. Comm.
Washington, D.C.

CONTRIBUTIONS OF:
 * \$100. - \$999
 ** \$1000 - \$4999
 *** \$5000 - \$9999
 **** over \$10,000

(PAC-Political Action Committee - A committee used by lobbyists and special interests to collect and distribute money for political campaigns.)

**Bob Short will owe his election to the people of Minnesota.
Who will you owe yours to, Dave?**

**WASH. REP. BOB SHORT and
SEN. DAVE DURENBERGER**

AND THE PEOPLE OF MINNESOTA

A

WHO ARE THESE PEOPLE WHO BOOED THE PRESIDENT OF THE UNITED STATES... AND WANT TO STOP BOB SHORT?

They are the same kind of people who booed and cursed Hubert Humphrey and Ed Muskie in 1968 and gave us Nixon and Agnew.

They are the same kind of people who divided the DFL party in 1966 and gave us Republicans Levander and Durenberger and the sales tax.

They are people who are losing influence in the party and if they can't run it they're going to ruin it.

They are people who don't really believe in democracy. If they can't dictate, by rigged endorsement, the election of candidates, they violate all the rules of decency, courtesy and dignity.

They are people who say they're in favor of free speech but try to shout down and boo down the very voice of free speech.

They claim to represent rank and file Democrats... but fail to realize that real rank and file Democrats want clean and decent campaigns and do have respect for our system of government.

They want to stop Bob Short at any cost ... so far the price is high:

- They've booed the president.
- They've sent threatening letters to Bob Short's family.
- They've made obscene phone calls to Bob Short's children.
- They've spread literature so rank they wouldn't put their name on it.
- They've destroyed, with hammers and clubs, Bob's personal property.

These are the people who want to stop Bob Short.
Help us stop them.

VOTE FOR BOB SHORT and END OBSCENE AND RANK LITERATURE

83040411306

A

THE STAR-TRIB BOYS . . .

Did you know the Minneapolis Star and Tribune is trying to make you vote for their Republican candidate for the U.S. Senate?

That's right. The Star-Trib boys have decided that Republican Durenberger is the right candidate for you.

So for months now they've been hammering away at Bob Short trying to make you think he's a bad guy. Well, they're wrong.

The real reason the Star-Trib boys don't like Bob Short is because they can't tell him what to do.

They fail to tell you that Durenberger, as Levander's chief aide, worked hard to give us the sales tax.

They fail to tell you that he has taken over one quarter of a million dollars of special interest campaign money from big oil, big banks and other lobbyists.

And, they fail to tell you that the Star-Trib boys themselves have given thousands of dollars to their candidate Durenberger.

So, we're telling you.

It doesn't bother the Star-Trib boys that these facts weren't reported in their paper because that might just get in the way of your voting for their candidate.

We think you should know the truth and we're asking you to vote for Bob Short and the rest of the DFL ticket.

And, by the way, when you vote DFL, you'll be sending Bob Short and Wendy Anderson to the Senate . . . and, you'll be sending a message to the Star-Trib boys.

VOTE FOR BOB SHORT and the entire DFL ticket!

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B

BOB SHORT

Knows about this Ad...He advised against it.

BUT

We Employees of BOB SHORT Companies believe you should know what we think of him

We employees of Bob Short companies want to let members of legislature and hotel unions know Bob Short with admiration and respect. Many of us have been with him from the day he got into the trucking business 25 years ago and in the hotel business 12 years ago. He is a good employer.

We admire the courage he displayed in running a very small real estate company, struggling to meet the payroll and building the premises as a main freight line between the Twin Cities and Chicago. We watched and worked with him as he displayed the guts in the two-wheel of the late 50's to stick with his struggling company line and instead of selling out, as did his partner in the company, he purchased the largest privately owned regional carrier here. That's when it became Admiral Merchants Motor Freight Lines, Inc.

We saw how he innovated new freights and hotel services, new customer relations, dealt with every problem of the operations, and worked more as an employee of the company than as the boss. He was one of us.

We take pride in the role that Bob Short has played in the affairs of our community by serving on countless committees, and we know

that when he joined others in sports activities, immediately he would be successful.

We are proud to be associated with Bob Short, the successful businessman. He is alert, totally unshakable, a man of nerve and fortune when he believes he is right. He is a decent man.

The door to his office has always been open to us, and we used to enjoy the interest he took in us personally and in our families.

Bob Short is that rare employer, who works harder at his job than any one of his employees, views them as his associates, and is not afraid to ask their opinion and advice. He has that rare quality of looking "down the road." No tunnel vision for Bob Short.

He has aided individuals of our companies when they have been in trouble. He has defrayed hospital and medical expenses when they could not do so themselves, and he has made certain that union employees qualified for union pension.

Bob Short has demonstrated that he is able to cope with the most difficult decisions that require LEADERSHIP—that rare quality that we see only in some men and women.

We know Bob Short to be compassionate, honest, fearless in his convictions, and above all else a workaholic to that end. We distinctly remember his advice to those who questioned the future of his companies and their many problems. He said, "Don't worry about it... Do something about it." He did... We hope we did.

Today, Admiral Merchants Motor Freight is successful. His Lexington Hotels are a credit to the Twin Cities and the hospitality they deliver as hosts to visitors to our cities.

Please believe us when we attest to the quality of man that Bob Short is. We hope you will elect him to the United States Senate.



BOB SHORT is a man of many talents and many accomplishments. He is a man of vision, a man of action, and a man of integrity. He is a man who has built a successful business from the ground up, and he is a man who has made a difference in the lives of many people. He is a man who is proud of his work, and he is a man who is proud of his company. He is a man who is proud of his community, and he is a man who is proud of his country. He is a man who is proud of his family, and he is a man who is proud of his friends. He is a man who is proud of his life, and he is a man who is proud of his legacy.

BOB SHORT is a man of many talents and many accomplishments. He is a man of vision, a man of action, and a man of integrity. He is a man who has built a successful business from the ground up, and he is a man who has made a difference in the lives of many people. He is a man who is proud of his work, and he is a man who is proud of his company. He is a man who is proud of his community, and he is a man who is proud of his country. He is a man who is proud of his family, and he is a man who is proud of his friends. He is a man who is proud of his life, and he is a man who is proud of his legacy.

C

WE TRUST DOB SHORT

- To sponsor a HUMAN LIFE AMENDMENT and oppose public funding for abortion. (MCCL Newsletter, Nov. 1978)
- To resist diluting his advocacy of JUSTICE FOR THE UNBORN, unlike his I-R Opponent, David Durenberger, who appeared to risk such weakness by hosting GLORIA STEINEM and the DFL Feminist Caucus at his home in 1976. (St. Paul Sunday Pioneer Press, September 17, 1978)
- To provide consistent and UNCOMPROMISING LEADERSHIP for the protection of human life, unlike his I-R opponent who is courting the DFL Feminist Caucus. (The Wanderer, October 26, 1978)
- To raise his voice in the Senate for ALL THE ISSUES THAT RESPECT LIFE and promote justice for the powerless.
- To avoid costly and dangerous programs for social engineering, unlike his I-R opponent who actively solicited and received endorsement by AMERICANS FOR DEMOCRATIC ACTION. (St. Paul Sunday Pioneer Press, October 1, 1978)
- To be a TRUE AND LASTING FRIEND of the unborn, the elderly, the handicapped, ethnic minorities, and stable family life. (Short has donated free office space to St. Paul Birthright for three years.)

TRUST SHORT - VOTE FOR LIFE

Carol Wold — Democratic National Committeewoman

Kay Hatfield
J. Buford Johnson
Bill Engen

—Members of the DFL
State Executive Committee

and DFL Statewide Pro-Life National Delegates and Alternates
to the 1978 Democratic National Convention
and the 1978 Democratic Mid-Term Conference

Frank Palatka
Rep. Senate District
Ed Naftick
Barney Reinhold

Karen Powell
Mick Ann Kucharski
John G. Smith
Joe Schmitt

Mary Frost
Anna Fowler
Celia Campbell
John G. Smith
Lynn Wenzel

Don Wenzel
Tom Thorsen Jr.
J. Buford Johnson
Chief Justice

Published by the Minnesota Life Action Fund, a non-profit organization for the protection of human life. The fund is a 501(c)(3) organization and is not affiliated with any political party.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald D. Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
401 Midwest Federal Bldg.
St. Paul, MN 55101

RE: MUR 812(78)

Dear Mr. Wozniak:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 11 CFR 109.2(c) for failure to report on behalf of which candidate(s) expenditures in excess of \$1000 were made prior to the election.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
5. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
6. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above-stated violations are based on the Commission's determination that through your contacts with Robert Short and Short's campaign, you may have acquired special knowledge of the candidate's needs, plans, and projects and used that knowledge to organize and advise the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee as to how to coordinate their activities on behalf of Short, thereby

negating the independence of the Committee. Therefore, expenditures made by the Committee on behalf of Short may have been in-kind contributions to his campaign.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

JUST A BUNCH OF PLAIN DFL FOLKS
WHO WANT COMMON SENSE GOVERNMENT ("COMMITTEE")

1. On what date was the Committee organized?
2. When did the committee first plan and make arrangements for the placing of political advertisements?
3. On what date did the Committee's total receipt of contributions or making of expenditures exceed \$1,000?
4. On October 28 and November 2, the Committee reported, via telegram, expending \$6,193.01 and \$14,195 respectively. Please state on behalf of which candidate(s) the expenditures were made and in what manner and amounts.
5. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?
6. Identify the organizers, officers, members and personnel of the committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Short? If so, please identify who was so engaged, in what capacity, and on what dates.
7. Did you or any other committee officers or members discuss or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
8. Did Mr. Short or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
9. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Were any contributions to the committee earmarked for a particular candidate?
 - d. Please attach a copy of any solicitation materials utilized by the Committee.
10. In your response, please provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.

IV



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oscar Molomot, Chairman
Employees of Bob Short Companies Committee
2950 Dean Parkway
Minneapolis, MN 55416

RE: MUR 812(78)

Dear Mr. Molomot:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 2 U.S.C. §434(b) for not properly reporting certain in-kind contributions to the Short campaign.
2. 2 U.S.C. §433 for failure to register with the Commission in a timely fashion.
3. 2 U.S.C. §441a for making in-kind contributions to the Short campaign which exceed the limitations of that section.
4. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
5. 2 U.S.C. §441d by incorrectly placing nonauthorization notices on your advertisements.

The above stated violations are based on the Commission's determination that since you have received reimbursement for campaign related activities from the Short campaign, expenditures made by the committee are not considered independent within the meaning of 2 U.S.C. §431p (see 11 CFR 109.1(b)(4)(i)(B)).

Further, the Commission requests that you amend your termination report by filing a summary page and stating the disposition of the Committee's residual funds.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (telephone no. 202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

EMPLOYEES OF BOB SHORT
COMPANIES COMMITTEE ("THE COMMITTEE")

1. On what date was the Committee organized?
2. When did the committee first plan and make arrangements for the placing of political advertisements?
3. On what date did the Committee's total receipt of contributions or making of expenditures exceed \$1,000?
4. Did the committee ever seek authorization from Mr. Short to receive contributions or make expenditures on his behalf?
5. Identify the organizers, officers, members and personnel of the committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Short. If so, please identify who was so engaged, in what capacity, and on what dates.
6. Did you or any other committee officers or members discuss or correspond with Mr. Short or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
7. Did Mr. Short or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
8. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Were any contributions to the committee earmarked for a particular candidate?
 - d. Please attach a copy of any solicitation materials utilized by the Committee.
9. In your response, please provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Foster, Treasurer
Short for Senate Committee of
Volunteers
P.O. Box 9402
401 Second Avenue South
Minneapolis, MN 55440

Re: MUR 812 (78)

Dear Mr. Foster:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812 (78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of:

1. 11 CFR 110.9(a) by accepting contributions in excess of the limitations set forth in 2 U.S.C. §441a.
2. 2 U.S.C. §441b by entering into a rental agreement for office space with the R. E. Short Company outside the ordinary course of business.
3. 2 U.S.C. §441b by using corporate WATs lines for campaign purposes.
4. 2 U.S.C. §434(b) for not properly reporting receipt of certain in-kind contributions.

The above stated violations of 2 U.S.C. §434(b) and 11 CFR 110.9(a) are based on the Commission's determination that expenditures made on behalf of Robert Short's campaign by the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and the Employees of Bob Short Companies Committee are not independent within the meaning of 2 U.S.C. §431p and are therefore considered in-kind contributions to the Short campaign.

The Commission has found no reason to believe:

1. that the Short for Senate Committee of Volunteers violated the Act for failure to report federal withholding taxes of staff payroll,
2. that the Short for Senate Committee of Volunteers violated the Act by incorrectly reporting the September 6 transfer of \$40,000 to the Democrats, Republicans and Independents United for a Pro Life Senate.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Short for Senate Committee of Volunteers
("the Committee")

1. State the location of all offices rented for campaign related activities by the Committee.
2. Name the contracting party for each office rented by the Committee.
3. Detail the conditions under which each office was rented including:
 - (a) dates of occupancy
 - (b) rental rate
 - (c) rental payment due date

and any other information you deem relevant.

4. Regarding the complainants allegation that the Committee used corporate WATs lines for campaign related activities, please state if corporate lines were used and if so, name the corporation which permitted the campaign to use its lines.

B 3 0 4 0 4 1 1 9 1



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Earl Short
8 Merilane
Minneapolis, MN 55436

RE: MUR 812(78)

Dear Mr. Short:

This letter is to notify you that the Federal Election Commission has received a complaint against your committee which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state violations of 2 U.S.C. §434(b), §441b and 11 CFR 110.9(a).

A copy of the notification letter which has been sent to your committee is enclosed for your information. Please respond to the enclosed questions within 10 days after your receipt of this notification.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Robert Earl Short

1. Identify the individuals and/or committees you authorized to receive contributions or make expenditures on behalf of your 1978 senate campaign.
2. When did you, your principal campaign committee, or other agents have knowlege of the existence of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("the Just a Bunch Committee") and its proposed or actual activities on behalf of your election?
3. When did you, your principal campaign committee, or other agents have knowlege of the existence of the Employees of Bob Short Companies Committee ("the Employees Committee") and its proposed or actual activities on behalf of your election?
4. Identify all conversations and correspondence you or your campaign staff had with the Just a Bunch Committee or any of its officers, members, or agents, including the dates and content thereof and the parties thereto. This would include any requests by the Just a Bunch Committee for authorization by you and any conveyances of appreciation for the committee's efforts on your behalf.
5. Identify all conversations and correspondence you or your campaign staff had with the Employees Committee or any of its officers, members or agents, including the dates and content thereof and the parties thereto. This would include any requests by the committee for authorization by you, and any conveyances of appreciation for the committee's efforts on your behalf.

VII



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

R. E. Short Company
215 South 11th Street
Minneapolis, MN 55403

RE: MUR 812 (78)

Dear Sir or Madam:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein, which pertain to your company, state a violation of 2 U.S.C. §441b (11 CFR 114.10(a)).

As set forth in 11 CFR 114.10(a), "A corporation may extend credit to a candidate, political committee, or other person in connection with a Federal Election provided that the credit is extended in the ordinary course of the corporation's business..."

Reports filed by the Short for Senate Committee of Volunteers indicate that the committee paid the R. E. Short Company \$2,400 for office rental space on October 10, 1978. The time period to which that payment applies is not clear. It appears that your company may have given an extension of credit to a federal campaign which is outside the ordinary course of business.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In your response, please include a copy of the contract which your company entered into with the Short committee.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

- 2 -

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

330401118



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Angell, Treasurer
Democrats, Republicans and
Independents United for a
Pro Life Senate
P. O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

RE: MUR 812(78)

Dear Mr. Angell:

This letter is to notify you that the Federal Election Commission has received a complaint against you which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 812(78). A copy of that portion of the complaint which pertains to you is enclosed. The Commission has no reason to believe that the matters alleged therein state a violation of any statute within its jurisdiction.

Accordingly, the Commission intends to close its file in this matter regarding the specific allegation of failure to report receipt of the \$40,000 transfer in a timely fashion.

If you have any questions, contact Suzanne Callahan at 202/523-4058.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Powers, Treasurer
735 E. Co. Rd. B.
St. Paul, MN 55117

RE: MUR 812(78)

Dear Mr. Powers:

The Commission has received a complaint from Paul Overgaard, chairman of the Durenburger for Senate Campaign, which included the enclosed advertisement placed by you.

Although the complaint made no specific allegations against you, the Commission has reason to believe that you may have violated 2 U.S.C. §434 for failure to file disclosure reports with the Commission.

The reporting requirements of §434 are detailed in 11 CFR §109 which sets forth the reporting requirements of persons or committees making independent expenditures on behalf of candidates for federal office. A copy of the Federal Election Campaign Act and Commission regulations are enclosed for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Please include in your response, answers to the enclosed questions.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. You will be sent copies or summaries of all correspondence received by the Commission from the complainant concerning this matter. If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this case.

-2-

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

930404118

Advertisement placed by a group of individuals in the Catholic Bulletin on behalf of Robert Short

("the Committee")

1. On what date was the Committee organized? By whom?
2. State the source of committee funds.
3. Detail the expenditures made to date by the committee.

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November 15, 1978

Mr. Lester W. Scall
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Scall:

I hereby submit additional information relating to my complaint dated October 30, 1978.

The enclosed newspaper advertisements were placed by the "Just a Bunch" Committee in the last few days before the November 7th election. The "Just a Bunch" Committee falsely claimed to be independent. The newspaper advertising cost approximately \$20,000.

In addition, the "Just a Bunch" Committee spent several thousand dollars on misleading advertising on radio stations WLOL and WCCO in Minneapolis.

Despite these extensive expenditures, no Statement of Organization was filed with the FEC until November 6th. The "Just a Bunch" Committee failed to report expenditures in excess of \$1,000 in violation of 11 C.F.R. 109.2(c) and appears not to have reported such expenditures even as of today's date.

These are significant and not merely technical violations because of the large amount of money spent and the knowing and willful effort to create the false impression that the expenditures were independent. Investigation of the circumstances and persons involved in the preparation and recording of the radio advertising will confirm that the "Just a Bunch" Committee can in no way be considered independent of the Short Committee.

807910

Mr. Lester W. Scall
November 15, 1978
Page (2)

Additionally, I enclose a newspaper article from the Minneapolis Tribune wherein Mr. Wozniak, Chairman of the "Just a Bunch" Committee admits that his group was actually organized at a fundraising event sponsored by the Short Committee!

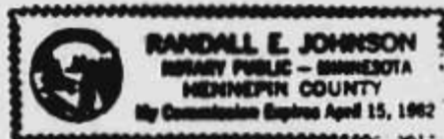
Finally I enclose a newspaper advertisement placed in The Catholic Bulletin which also purports to be independent despite Mr. Wozniak's involvement.

These facts show a repeated pattern of knowing and willful violations by Mr. Short, Mr. Wozniak, and their various front groups. Further investigation by the FEC should include the failure of the Short Committee to report prompt payment of rent for its headquarters (owned by a Short-controlled corporation), failure to report federal tax withholding of staff payroll, use of corporate WATS lines, and other serious violations.

Sincerely,

Paul P. Overgaard
Paul P. Overgaard

Subscribed and sworn to before
me this 15 day of November, 1978.



Committees Continued from page 2B

mally associated with the Short campaign, or that they are receiving any funding from Short or his campaign committee. They also said that the 10-day period for them to register with the FEC has not yet elapsed.

Fred Gates, manager of the Short campaign, denied any formal connection between the Short committee and the two groups. Gates also suggested that the Minnesotans for Honesty in Politics may not be very independent of Durenberger, an Independent-Republican.

The group consists largely of liberal DFLers who were upset by Short's primary election victory over U.S. Rep. Donald Fraser, who was the DFL endorsee for the Senate seat now held by Muriel Humphrey. About two weeks ago, they launched a "Stop Short" effort.

With the general election just six days away, Durenberger and Short are locked in a tight contest. The Minneapolis Tribune's most recent Minnesota Poll two weeks ago showed them even.

Overgaard told reporters yesterday that Short has a history of setting up and funding phony committees. He cited the case of a group called "Democrats, Republicans and Independents United for a Pro-life Senate," which circulated anti-Fraser leaflets on the final weekend before the Sept. 12 primary election.

He said this group did not register until a few days before the primary and did not disclose until after the primary that all but \$35 of its \$40,035 in contributions had come from the Short campaign.

Overgaard said that Short and his campaign have direct ties to the "Just a Bunch of Folks" committee and the "Employees of Bob Short" committee, both of which have published advertisements in Short's behalf in recent days.

He said former state Rep. D.D. Wozniak of St. Paul, chairman of the "Just a Bunch of Folks" committee, is a close friend of Short who has been active in the Short campaign and has contributed at least \$1,500 to it.

He said that Oscar Molomot, chairman of the "Employees" committee, is a top assistant of Short who previously received reimbursements from Short's committee for expenses incurred while working on the Short campaign.

Overgaard suggested that these two committees could be used for the same kind of "last-minute smears" that were made by Short backers against Fraser in the primary. "Given the history of Bob Short, this is

the season for unusual campaign activity," he said.

Wozniak said in response that his committee "has absolutely no connection with Short or his committee. It has received absolutely no money from Short or his committee."

He said a group of Short's supporters got the idea of forming the committee while chatting at a Short fundraising event last Wednesday in St. Paul. He said members of the group "just thought the Short campaign wasn't bringing forth some facts that should be brought forth."

According to Wozniak, the group's members include former Gov. Karl Rolvaag, former state Rep. Peter Popovich of St. Paul and Mike McLaughlin, DFL chairman in the Fourth Congressional District.

(Short ran for lieutenant governor as Rolvaag's running-mate in 1966 after the party rejected Rolvaag in favor of Lt. Gov. A.M. Keith. Rolvaag and Short won the DFL primary, but lost in the general election.)

Molomot, Short's publicist and personal assistant for the last 18 years, said he got the idea of forming the "Employees" committee for Short and enlisted the aide of H. P. Traua, vice president of sales for Short's truck line, Admiral-Merchants Motor Freight, Inc.

He said more than 500 employees signed their names to the advertisement and contributed to pay for it. The ad defended Short's record as an employer, a record that has been attacked by several labor unions.

A college student who had been on the payroll of Short's Leamington Hotel until last week told the Tribune that employees were called to a meeting one afternoon, told about Molomot's intention to run the ad, and asked to sign a slip of paper authorizing the use of their names. The employees also were asked to contribute \$10, \$5, \$2 or some other amount, he said.

The student said all of the hotel supervisors were at the meeting and many employees "were kind of afraid that if they didn't pay the money or sign the paper, they might lose their job."

Molomot denied that the employees were pressured in any way. He said many of the employees who gave their names and money "have been with him (Short) for 28 years he has been in the trucking business or the 13 years he has been at the Leamington."

Late in the day, Gates held a news conference to respond to Overgaard and to charge that Minnesotans for Honesty in Politics had failed to register with the FEC within the required time period.

Mary Grace Flannery, Minneapolis, treasurer for the group, denied the charge. Flannery said she mailed the group's registration on Oct. 24 and mailed its first financial disclosure report on Oct. 26. She said the report disclosed that her group had raised \$1,000 from Oct. 1 to Oct. 24.

Durenberger aide: Groups backing Short are only fronts

By Steven Dornfeld
Staff Writer

David Durenberger's campaign manager charged Tuesday that two so-called "independent" committees supporting fellow Senate candidate Robert Short are not really independent.

Paul Overgaard, manager of the Durenberger campaign, said that groups calling themselves "Just a Bunch of Plain Folks Who Want Common Sense Government" and "Employees of Bob Short Companies" are front organizations for the DFL Senate candidate.

Overgaard said neither group has registered with the Federal Elections Commission (FEC) or disclosed its funding sources. He said the Durenberger campaign has formally asked the FEC to investigate the two groups, their apparent ties to Short and their funding sources.

Leaders of the two committees immediately denied that they are for-

Committees continued on page 4B



RECEIVED
FEDERAL ELECTION
COMMISSION

NOV 20 PM 10:58

Mr. Lester N. Scall
Assistant General Counsel
Federal Election Commission
125 K Street NW 20463
Washington, D.C.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

November 2, 1978

Paul Overgaard
Campaign Manager
Durenberger for U.S. Senate
Suite 164
8120 Penn Avenue South
Minneapolis, Minnesota 55431

Dear Mr. Overgaard:

This is to acknowledge receipt of your complaint of October 31, 1978, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. A recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary complaint.

Sincerely,

A handwritten signature in dark ink, which appears to read "Lester N. Scall", is written over the typed name.

Lester N. Scall
Assistant General Counsel

812 300 5439

DURENBERGER FOR U.S. SENATE

Suite 164, 8120 Penn Avenue South, Minneapolis, Minnesota 55431 612/888-1244

October 31, 1978

Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

807570

Dear Sir:

30040411833

This is a complaint under 2 U.S.C. 437g of the Federal Election Campaign Act of 1971, as amended, against Bob Short, the Short for Senate Committee, Mr. Donald D. Wozniak, and the so-called Just a Bunch of Plain Folks Who Want Common Sense Government Committee, and the so-called Employees of Bob Short Companies Committee.

The enclosed newspaper advertisement appeared in the Minneapolis Tribune on October 29, 1978. The advertisement's notice of authorization falsely and misleadingly claims that it was placed by an independent political committee and not authorized by candidate Short. I understand that last-minute negative radio advertising has also been prepared with the same false and misleading disclaimer.

In fact, "D.D. Wozniak, Chairman" of the "Just a Bunch..." committee is Mr. Donald D. Wozniak, 303 Woodlawn Avenue, St. Paul, Minnesota. Mr. Wozniak is a close personal friend of candidate Short, has consulted frequently with Short about the campaign, is active in activities of the Short for Senate Committee, contributed at least \$1500 to the Short for Senate Committee, and... as shown by the enclosed newspaper article--has been a major public organizer of the Short Committee.

The "Just a Bunch..." committee is not in fact independent of the Short Committee and because of Mr. Wozniak's involvement cannot be considered "independent" within the meaning of the Federal Election Campaign Act. The facts in this case are the same as in MUR 321 (November 2, 1977) involving Mr. Peter F. Secchia's activities on behalf of the President Ford Committee. In MUR 321 Mr. Secchia was fined by the Federal Election Commission for his illegal activities.

Additionally, on October 30, 1978, the enclosed newspaper advertisement appeared in the Minneapolis Star with a false and misleading disclaimer suggesting that it was placed by a group called "Employees of Bob Short Companies" independent of the Short for Senate Committee. This is not an independent committee but just another front group for candidate Short. The supposed chairperson of the "Employees" committee is Mr. Oscar Molomot; on October 10, 1978, according to FEC records, Mr. Molomot received reimbursement for expenses from the Short Committee. Federal law prohibits a person who "has been receiving any form of compensation or reimbursement from the candidate's committee" from making independent expenditures. 11 C.F.R. 109.1 (b) (4) (B)

Short's activities involve violations not only of the notice of authorization requirements (2 U.S.C. 441d) but also the registration requirements of 2 U.S.C. 434 because -- despite expenditures far in excess of \$1000---neither the "Just a Bunch..." committee nor the "Employees" committee filed registration statements with the Federal Election Commission as of October 31, 1978.

It is also likely that certain individuals exceeded the contribution limitations of 2 U.S.C. 441a because contributions to the "Just a Bunch..." and "Employees" committee must be added to other direct contributions to the Short Committee.

8304041183

Office of the General Counsel
Page 3
October 31, 1978

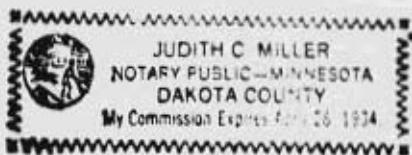
The FEC should immediately investigate these violations and the true source of the funds the "Just a Bunch..." and "Employees" committees are spending on their last-minute advertising campaign.

Mr. Short has already loaned his authorized committee well in excess of one million dollars. Documents now on file and in the public record at the FEC and Secretary of State's Office show that Short's own committee transferred \$40,000 to a group calling itself "Democrats, Republicans and Independents United for a Pro-Life Senate" just a few days before the September 12th Primary election but did not report the transfer until after the Primary election.

Short is now trying the same last-minute tactics by using his "Just a Bunch..." committee as a front group.

The repeated nature and pattern of these violations indicates that they are knowing and willful and therefore in violation of 2 U.S.C. 441a (f).

The people of Minnesota have the right to know how much money Mr. Short is funnelling into his supposedly independent committees before the General election; the Federal Election Campaign Act clearly requires Short to make such disclosures; and the FEC is empowered and required to commence its investigation expeditiously under 2 U.S.C. 437g.



Sincerely,

Paul Overgaard
Paul Overgaard
Campaign Manager

Subscribed and sworn to before me
on this 1st day of Nov, 1978.

Judith C. Miller

8304011183

BOB SHORT

Knows about this Ad...He advised against it. BUT

We Employees of BOB SHORT Companies believe you should Know what we think of him.

We employees of Bob Short companies—most of us members of teamster and hotel unions—view Bob Short with admiration and respect. Many of us have been with him from the day he got into the trucking business 28 years ago and in the hotel business 13 years ago. He is a good employer.

We admire the courage he displayed in joining a very small trucking company, struggling to meet the payroll, and building the carrier as a major freight line between the Twin Cities and Chicago. We watched and worked with him as he displayed the fortitude in the recession of the late 50's to stick with his struggling truck line and instead of selling out, as did his partner in the company, he purchased the largest privately-owned regional carrier here. That's when it became Admiral-Merchants Motor Freight Lines, Inc.

We saw how he innovated new freight and hotel service, new customer relations, dealt with every problem of the operations, and worked more as an employee of the company than as the boss. He was one of us.

We take pride in the role that Bob Short has played in the affairs of our community by serving on various committees, and we know

that when he joined others in sports activities, ultimately he would be successful.

We are proud to be associated with Bob Short, the successful businessman. He is alert, totally unafraid to risk his name and fortune when he believes he is right. He is a decent man.

The door to his office has always been open to us, and we viewed amazingly the interest he took in us personally and in our families.

Bob Short is that rare employer, who works harder at his job than any one of his employees, views them as his associates, and is not afraid to ask their opinion and advice. He has that rare quality of looking "down the road." No tunnel-vision for Bob Short.

He has aided individuals of our companies when they have been in trouble. He has defrayed hospital and medical expenses when they could not do so themselves, and he has made certain that union employees qualified for union pension.

Bob Short has demonstrated that he is able to cope with the most difficult decisions that require LEADERSHIP—that rare quality we see only in some men.

We know Bob Short to be compassionate, honest, fearless in his convictions, and above all else a workaholic to that end. We distinctly remember his advice to those who questioned the future of his companies and their many problems. He said, "Don't worry about it... Do something about it." He did... We hope we did.

Today, Admiral Merchants Motor Freight is successful. His Leamington Hotels are a credit to the Twin Cities and the hospitality they deliver as hosts to visitors to our cities.

Please believe us when we attest to the quality of man that Bob Short is. We hope you will elect him to the United States Senate.



They're MAD at YOU!

As you read the rantings of the supposedly neutral metropolitan press, and listen to the wailings of the party power brokers, you get the impression that they're mad at Bob Short.

But they're not really mad at him at all. They're mad at you!

They're mad at you for not letting them hand-pick the next senator from Minnesota.

They're mad at you because you selected a man they know they can't control.

They're mad at you because you voted for lower taxes and less bureaucracy, which they're afraid will threaten some of their costly pet projects.

They're mad at you for voting what they say are your "special interests." What that really means is that you voted for your interests rather than theirs.

And finally, they're mad at you simply because they're elitists, who feel they're better equipped to select your candidates than you are.

So they're mad. Mad that you didn't listen to them on September 12. And you know what ... they're going to be even madder when you don't listen to them on November 7.

**Vote for BOB SHORT and
the entire DFL ticket!**

Paid Advertising. Prepared, inserted and paid for at regular advertising rates by Just a Bunch of Plain DFL Government Committee, D. D. Wozniak, Chairman, 401 Midwest Federal Bldg., St. Paul 55101. No Candidates.

ues stir hottest s in District 64B

Severa DFLers

Dispatch
9/5/78

back Short

By GARY DAWSON
Staff Writer

endorsements from most major labor unions.

But the biggest difference, Byrne said, is that she has changed her style as a legislator.

"I'm not introducing so many bills any more," she explained. Instead, she is concentrating on "constituent services" — helping residents deal with state agencies, trying to get state programs into the district, acting as a spokesman at public hearings and attending "as many community meetings as possible."

BYRNE, in effect, has been campaigning for two years. "Elections are won in non-election years," she said.

Nonetheless, DFL strategists said Byrne could be in trouble. The reason is Zasada's effort to portray her as too liberal for the district.

"It's true she hasn't introduced as many goofy bills as she used to, but she still has the same philosophy," the challenger said. "She is a naive, immature ultra-liberal. I am a conservative Democrat."

Byrne said, "There is no doubt he is coming off as an ultra-conservative, but there's no way I'm ultra-liberal. My views are moderate. They reflect those of my district — conservative on moral and social issues but hardly conservative on economic issues. We believe some of this country's wealth should be redistributed to low and middle-income people."

TO SHOW HE is more conservative on abortion, Zasada said, "I have been in the pro-life movement from the start. Byrne claims she is pro-life, but she isn't active in any pro-life organizations. I think that indicates

See News, Page 18

Calling Edina businessman Bob Short the DFLer who can best deal with issues of inflation and moral decay, several prominent Democrats, including former Gov. Karl Rolvaag and St. Paul Councilwoman Rosalie Butler, urged the election of Short over Congressman Donald Fraser in the Sept. 12 DFL U.S. senatorial primary.

AMONG THOSE appearing at a press conference to boost Short's chances and place yet another roadblock in Fraser's DFL party-endorsed effort to win the DFL nomination for the Senate seat vacated by Hubert Humpfrey, were:

Rolvaag; Butler, Former Secretary of State Joseph Donovan; former state legislator D. D. (Don) Wozniak; Ramsey County director of property taxation Lou McKenna and former state legislator Peter S. Popovich.

It was well known they and several other well-known DFLers were backing Short. Why did they wait until now to back him publicly?

"I THINK this is the appropriate time to do it," said Rolvaag of the timing designed to make voters aware that the primary will be held just a week from Tuesday. "I think he (Short) is going to win."

Rolvaag thus comes back once again to haunt the DFL Party which denied him endorsement to run for a second term as governor in 1966. Rolvaag took the battle to the primary and won the party nomination, but with a

See Short, Page 18

Byrne Zasada

that tactic two years ago, and it almost worked.

ZASADA, 304 Edmund Ave., came within 149 votes of unseating Byrne in a four-way DFL primary in 1976. The incumbent, moving for her second term, received a narrow 42 percent plurality in the contest.

Two years ago, the three challengers had similar, conservative social views, and they split the conservative vote, according to Zasada.

"This time," he said, "it's a much rarer, and I think I'll get most of the votes that went to

lection '78

the other challengers in 1976. The people who voted for them don't share my views."

Byrne, 304 Van Buren Ave., said that is wishful thinking.

"I HAVE LEARNED — one lesson, and things have changed," asserted the 49-year-old full-time law professor and part-time graduate student. "I am in a much stronger position this year."

The change is that she has DFL endorsement, something she lacked in 1976. She also has

Bring those little feet to ConnCo
before they go back to school.



2. Entrance must be made at the gate as far as possible with least delay, through the gate in the morning and through the gate in the afternoon.

Paul Overgaard
Durenberger for U.S. SEN.
8120 Penn Avenue South
Bloomington, MN 55431

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RECEIVED
FEDERAL ELECTION
COMMISSION

18 NOV 2 AM 10:02

Office of the General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

COMPLAINT



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 812

Date Filmed 6/23/83 Camera No. --- 2

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