



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 812, 818, 853

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

Cameraman LPC

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):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Date

Stephen M. Callahan
6/8/8

203723

GCC 49293
RECEIVED AT THE FEC

83 JAN 7 P2:48

State Offices
D. D. Wozniak

401 Midwest Federal Building, St. Paul, Minnesota 55101

(612) 227-5444

January 4, 1983

D. D. Wozniak

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MURs 812 and 853 (1978)

Dear Mr. Gross:

This letter is in response to your December 15th letter.

Consent is hereby given to place my brief as part of the
public record.

Thank you.

Yours very truly,

D. D. WOZNIAK

DDW:ml

cc: Mr. Peter S. Popovich, Esq.

33043410903

3 JAN 7 P4:43

Post Office

J. J. Wozniak

Midwest Federal Building

Saint Paul, Minnesota 55101

PROTECT OUR ENVIRONMENT

RECEIVED AT THE FEC
83 JAN 7 P2:48

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

8304041

First Class Mail



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

Peter S. Popovich, Esq.
Peterson, Popovich, Knutson & Flynn
314 Minnesota Building
St. Paul, Minnesota 55101

D.D. Wozniak Esq.
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MURs 812 and 853 (1978)

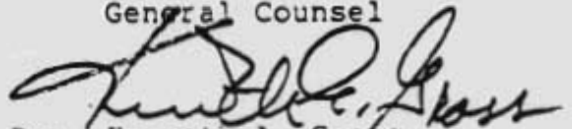
Dear Mr. Popovich and Mr. Wozniak:

This is to advise you that the Commission has determined to close its files in the above-captioned matters. Accordingly, they will become part of the public record within thirty days. See 11 C.F.R. § 4.4(a). However, 2 U.S.C. § 437g(a)(4)(B) prohibits the Commission from making public any action by the Commission or any person, and any information derived, in connection with any conciliation attempt by the Commission pursuant to 2 U.S.C. § 437g(a)(4)(A) without the written consent of both the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing as soon as possible.

If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

33040110907



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

December 15, 1982

Peter S. Popovich, Esq.
Peterson, Popovich, Knutson & Flynn
314 Minnesota Building
St. Paul, Minnesota 55101

D.D. Wozniak Esq.
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MURs 812 and 853 (1978)

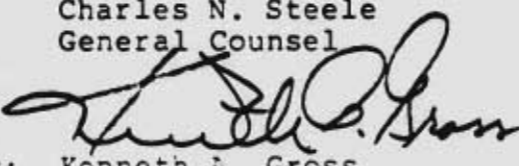
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Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

33040410903



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1982

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

Re: MURs 812 and 853 (1978)

Dear Mr. Jensen:

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Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", is written over the typed name of the Associate General Counsel.

By: Kenneth A. Gross
Associate General Counsel

83040410903



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1982

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

Re: MURs 812 and 853 (1978)

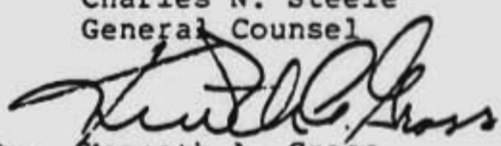
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Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

33040110910



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1982

Mr. Douglas V. Swanson
R.E. Short Company
215 South Eleventh Street
Minneapolis, MN 55403

Re: MURs 812 and 853 (1978)

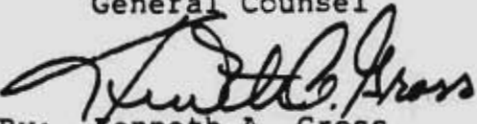
Dear Mr. Swanson:

This is to advise you that the entire files in these matters have now been closed and will become part of the public record within thirty days. See 11 C.F.R. § 4.4(a).

If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

83040410911



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

Mr. Kevin Powers
735 East Country Road B
St. Paul, MN 55117

Re: MURs 812 and 853 (1978)

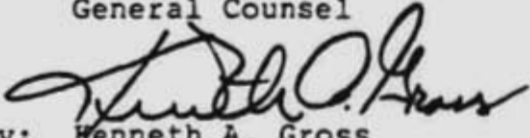
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Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

33040410912



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1982

Mr. John Angell, Treasurer
Democrats, Republicans and Independents
United for a Pro-Life Senate
P.O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

Re: MURs 812 and 853 (1978)

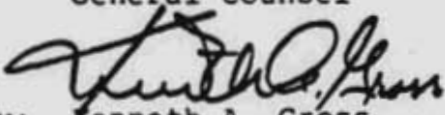
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Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

33040410913



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Peter S. Popovich, Esq.
Peterson, Popovich, Knutson & Flynn
314 Minnesota Building
St. Paul, Minnesota 55101

D.D. Wozniak Esq.
401 Midwest Federal Building
St. Paul, Minnesota 55101

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8304041091



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Peter S. Popovich, Esq.
Peterson, Popovich, Knutson & Flynn
314 Minnesota Building
St. Paul, Minnesota 55101

D.D. Wozniak Esq.
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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

3304041091



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

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

Re: MURs 812 and 853 (1978)

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8304041091
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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MURs 812 and 853 (1978)

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

33040110912



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Douglas V. Swanson
R.E. Short Company
215 South Eleventh Street
Minneapolis, MN 55403

Re: MURs 812 and 853 (1978)

Dear Mr. Swanson:

This is to advise you that the entire files in these matters have now been closed and will become part of the public record within thirty days. See 11 C.F.R. § 4.4(a).

If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

33040110915



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Kevin Powers
735 East Country Road B
St. Paul, MN 55117

Re: MURs 812 and 853 (1978)

Dear Mr. Powers:

This is to advise you that the entire files in these matters have now been closed and will become part of the public record within thirty days. See 11 C.F.R. § 4.4(a).

If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

33040410913



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. John Angell, Treasurer
Democrats, Republicans and Independents
United for a Pro-Life Senate
P.O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

Re: MURs 812 and 853 (1978)

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If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

OK 12/13/80

By: Kenneth A. Gross
Associate General Counsel

33040110910

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Federal Election Commission v. Short,)
Civil Action No. 3-82-192 (D. Minn.)
consent order entered September 27,)
1982)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 13, 1982, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Close the files in MUR 812, In the Matter of Bob Short (1978) and MUR 853, In the Matter of Just a Bunch of Plain DFL Folks Who Want Common Sense Government (1978).
2. Approve the notification letter to the respondents, as submitted with the General Counsel's Memorandum to the Commission, undated.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

12/13/82
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

12-8-82, 1:44
12-9-82, 11:00

33040410921

SENSITIVE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 DEC 8 P 1: 44

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: Federal Election Commission v. Short,
Civil Action No. 3-82-192 (D. Minn. consent order
entered September 27, 1982).

330404109232

The Commission recently received three checks each in the amount of \$400.00 which were submitted by the defendant committees in the above-captioned litigation as payment of the civil penalties imposed upon them by the consent order entered by the court. The Commission and the Secretary of the United States Senate also received amended reports filed on behalf of each of the three committees. With the aforementioned actions, the defendant committees now have fully complied with the terms of the consent order. As these committees are the only remaining respondents in the underlying enforcement actions (MUR 812, In the Matter of Bob Short (1978) and MUR 853, In the Matter of Just A Bunch of Plain DFL Folks Who Want Common Sense Government (1978)), the Office of the General Counsel recommends that the Commission close the files in both of those matters and approve the attached notification letters to respondents.

RECOMMENDATION

1. Close the files in MUR 812, In the Matter of Bob Short (1978) and MUR 853, In the Matter of Just A Bunch of Plain DFL Folks Who Want Common Sense Government (1978), and approve the attached notification letters to respondents.

Attachments

Proposed notification letters to respondents. (6).



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. John Angell, Treasurer
Democrats, Republicans and Independents
United for a Pro-Life Senate
P.O. Box 19029
Diamond Lake Station
Minneapolis, MN 55419

Re: MURs 812 and 853 (1978)

Dear Mr. Angell:

This is to advise you that the entire files in these matters have now been closed and will become part of the public record within thirty days. See 11 C.F.R. § 4.4(a).

If you should have any questions regarding these matters, please contact Suzanne Callahan, the Commission staff member assigned to these matters, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

2304041092



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Kevin Powers
735 East Country Road B
St. Paul, MN 55117

Re: MURs 812 and 853 (1978)

Dear Mr. Powers:

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 2 (1 of 1)

33040410913



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Douglas V. Swanson
R.E. Short Company
215 South Eleventh Street
Minneapolis, MN 55403

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 3 (1 of 1)

8304041092



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Frank J. Walz, Esq.
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Thirty-Eighth Floor, IDS Tower
80 South Eighth Street
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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

83040110917



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

Re: MURs 812 and 853 (1978)

Dear Mr. Jensen:

33040110918
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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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St. Paul, Minnesota 55101

D.D. Wozniak Esq.
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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Just a Bunch of Plain DFL) MUR 812/853
Folks Who Want Common)
Sense Government Committee)
("JAB"))

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 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

33040410930

910 736

RECEIVED
AC 1365

81 MAR 30 A8:56

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)

VELAZQUEZ, ZI
MADRID I, SPAIN
225 40 44
TELEX 23843LOCAL COUNSEL
FRANK J. WIRGADAVID BURLINGAME
MARTIN M. BERLINER
GREGORY A. KEARNS
JACK M. WESOKY
SUITE 3100 SECURITY LIFE BUILDING
1616 GLENARM PLACE
DENVER, COLORADO 80202
(303) 573-7737OF COUNSEL
CHRISTOPHER H. MUNCHSUITE 800
1919 PENNSYLVANIA AVENUE N.W.
WASHINGTON, D.C. 20006
(202) 687-1400PATRICK J. O'CONNOR
WILLIAM T. HANNAN
EDWARD W. BROOKE
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
DAVID R. MELINCOFF
DELANCET W. DAVIS
RICHARD G. MORGAN
THOMAS V. VAKERICS
MYLES J. AMBROSE
DOUGLAS M. CARNIVAL
TERENCE P. BOYLE
MORE S. FOSTER
BRIAN P. PHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. CONLON
DONALD S. ARBOUR
PETER C. KISSEL
PATRICK E. O'DONNELL
J. WILLIAM W. HARSCH
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON III
GORDON A. GAYER
ROBERT J. STEELE
CHRISTINA W. FLEPS
MICHAEL E. VEVE
MARTHA PRIDDY PATTERSON
JAMES H. HOLT
MARY SUSAN PHILP
GRANT E. MORRIS
F. GORDON-LEE
DONNA R. PATRICK
BRIAN DUNN
LAURENCE BOSCHER
BRENDA A. JACOBS
J. TIMOTHY O'NEILLOF COUNSEL
JOSEPH F. CASTIELLO
FRED D. THOMPSON
JOHN H. HOLCOMAN II

NOT MEMBER OF MINNESOTA BAR

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. MCGUIRE
ROBERT J. CHRISTIANSON, JR.
CHARLES S. FASORE
FRANK J. WALT
JAMES R. DORSEY
ANDREW J. SHEA
WILLIAM R. MCGRATH
WALTER C. PARKINS
KENT E. RICHEY
JAMES OTIS REYER
JAMES A. RUBENSTEIN
JEREMIAH J. KEARNEY
WILLEM F. VAN VLIET
THOMAS R. SHERAN
JOHN A. BURTON, JR.
JAMES R. CASSELY
ROBERT A. BRUNIO
FREDERICK W. MORRIS
WILLIAM E. FLYNN
RANDOLPH J. HAYER
DOUGLAS J. FRANZEN
WILLIAM D. HULL
DAVID W. KELLEY
STEVEN J. TIMMER
DAVID KANTOR
LINDA C. SCHWARTZ
JUDITH M. WOLF
ARLIN S. WAELTI

WILLIAM C. KELLY (1916-1970)

March 26, 1981

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

Re: MUR 818

Dear Mr. Steele:

I have your letter of February 26, 1981, advising that the file in the above matter will become part of the public record at this time, except for those portions of the file generated in connection with conciliation efforts.

Based upon my telephone conversation with Suzanne Callahan of your staff, it is my understanding that under the foregoing guidelines, the "file" will essentially consist of investigation materials and correspondence from the inception of the complaint through the Commission's action on October 2, 1979. Inasmuch as the position of the Short Committee and DRIPS in the matter was fairly well stated in our submission dated September 5, 1979, I see no need for any of the information generated in connection with the lengthy conciliation period to be made public.

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All: 41

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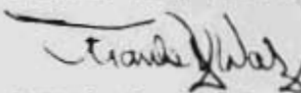
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Mr. Charles N. Steele
Page 2
March 26, 1981

Finally, it is my understanding that materials otherwise contained in the file which encompass testimony or references to open or pending MUR's will not be made public at this time.

If my understanding is incorrect, please advise promptly.

Yours very truly,



Frank J. Walz

FJW:emw

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81 MAR 30 AB: 56

CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER

80 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402

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

8304041093

In the Matter of)

Just A Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)

MUR 812/853

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On December 20, 1979, the Commission, based upon a notarized complaint filed by Paul Overgaard, found reason to believe that the Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("JAB") may have violated 2 U.S.C. §§ 433, 434(b), 441a, 11 CFR 110.9(a), 109.2(c), and 441d. The Commission's reason to believe findings that JAB may have violated 2 U.S.C. §§ 433, 434, and 109.2(c) were also based on a complaint filed by Ned Crosby, Chairman, Minnesotans for Honesty in Politics. (MUR 853).

After an investigation was conducted, the Commission, on November 14, 1979, determined that there was no reasonable cause to believe violations of 2 U.S.C. §433, §441d, or 11 CFR 110.9(a) had been committed.

The Office of General Counsel's findings in connection with 2 U.S.C. §434(b), 441a and 11 CFR 109.2(c) are discussed below.

II. Legal Analysis

Independent Expenditure Status

Since the remaining Commission findings, in connection with 2 U.S.C. §§ 434, 441a, and 11 CFR 109.2(c), are contingent upon whether or not the JAB committee is viewed as independent

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within the meaning of the Act, the independent expenditure status of the group is addressed separately below.

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.

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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. 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.

Investigation reveals 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 and 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's acting as 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 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;

(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.

§ 434

Since the expenditures made by JAB are not independent as defined by § 431(17) (formerly § 431(p)), the expenditures should be regarded as in-kind contributions to the Short campaign (11 C.F.R. 109.1(c)) and should have been reported as such by JAB. The committee's failure to report its financial activity in accordance with 2 U.S.C. § 434 places it in violation of that section.

§ 109.2(c)

On October 28 and November 2, JAB reported to the FEC, via telegram, expending \$6,193.01 and \$14,195, respectively, in connection with the 1978 general election. The Committee failed to report on behalf of which candidate the expenditures were made, a violation of 11 C.F.R. 109.2(c). When questioned, Brian Short testified that the deletion of the candidate's name was inadvertent. It is recommended that the Commission find probable cause to believe § 109.2(c) has been violated.

III. General Counsel's Recommendations

1. Find probable cause to believe that Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee violated 2 U.S.C. §§ 434(b), 441a and 11 C.F.R. 109.2(c).

21 April 1980
Date



Charles N. Steele
General Counsel

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Calkins

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 RESPONDENTI. 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

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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.

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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.

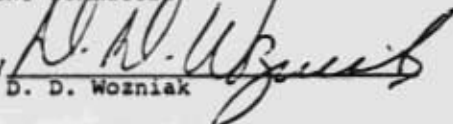
Finally, the General Counsel states that Brian Short, Mr. Short's son, "acted as treasurer" of Just a Bunch, while at the same time holding the position of campaign director to the Short committee. Statements like that are highly misleading, in light of the record. Wozniak was aware that Brian Short 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.

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John Officers
D. D. Wozniak

481 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:

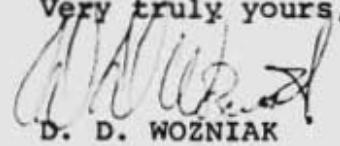
On April 28, 1980, I received your letter of April 21st. I am actively engaged in trial since we are ending our term with my last case scheduled for trial on June 2nd, 1980.

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

DDW:gaj

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RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Post Office

A. D. Wozniak

491 Midwest Federal Building

St. Paul, Minnesota 55101



RETURN RECEIPT REQUESTED

CERTIFIED

No. 414259

MAIL

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

First Class Mail

April 21, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MURs 812/853

Please have the attached Memo distributed to the Commission on an informational basis. Please return the original to this office. Thank you.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 812/853

Dear Mr. Wozniak:

Based on complaints filed with the Commission on November 2 and 13, 1979, the Commission determined on December 20, 1979, that there was reason to believe that your committee may have violated sections 433, 434(b), 441a, 441d of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.9(a) and § 109.2(c) 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 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.

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Mr. Donald Wozniak
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

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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 THIS)		
2. ARTICLE ADDRESSED TO:		
<i>Donald Wozniak</i>		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURANCE NO.
	<i>944580</i>	
I have received the article described above.		
SIGNATURE	☐ Addressee	☐ Authorized agent
<i>H. A. Jones</i>		
4. DATE OF DELIVERY		
<i>APR 2 1980</i>		
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		
<i>Callahan: MDR 8/2/853</i>		



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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April 21, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 812/853

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

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In the Matter of)
)
Just A Bunch of Plain DFL) MUR 812/853
Folks Who Want Common Sense)
Government Committee)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On December 20, 1979, the Commission, based upon a notarized complaint filed by Paul Overgaard, found reason to believe that the Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("JAB") may have violated 2 U.S.C. §§ 433, 434(b), 441a, 11 CFR 110.9(a), 109.2(c), and 441d. The Commission's reason to believe findings that JAB may have violated 2 U.S.C. §§ 433, 434, and 109.2(c) were also based on a complaint filed by Ned Crosby, Chairman, Minnesotans for Honesty in Politics. (MUR 853).

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within the meaning of the Act, the independent expenditure status of the group is addressed separately below.

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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.

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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.

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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. 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.

Investigation reveals 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 and 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's acting as 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 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.

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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;

(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.

§ 434

Since the expenditures made by JAB are not independent as defined by § 431(17) (formerly § 431(p)), the expenditures should be regarded as in-kind contributions to the Short campaign (11 C.F.R. 109.1(c)) and should have been reported as such by JAB. The committee's failure to report its financial activity in accordance with 2 U.S.C. § 434 places it in violation of that section.

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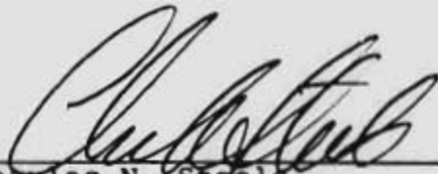
§ 109.2(c)

On October 28 and November 2, JAB reported to the FEC, via telegram, expending \$6,193.01 and \$14,195, respectively, in connection with the 1978 general election. The Committee failed to report on behalf of which candidate the expenditures were made, a violation of 11 C.F.R. 109.2(c). When questioned, Brian Short testified that the deletion of the candidate's name was inadvertent. It is recommended that the Commission find probable cause to believe § 109.2(c) has been violated.

III. General Counsel's Recommendations

1. Find probable cause to believe that Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee violated 2 U.S.C. §§ 434(b), 441a and 11 C.F.R. 109.2(c).

21 April 1980
Date



Charles N. Steele
General Counsel

83040410939



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 812/853

Dear Mr. Wozniak:

Based on complaints filed with the Commission on November 2 and 13, 1979, the Commission determined on December 20, 1979, that there was reason to believe that your committee may have violated sections 433, 434(b), 441a, 441d of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.9(a) and § 109.2(c) 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 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.

3304041093C

Mr. Donald Wozniak
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

33040410951

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 Eugen

—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

Steve Palatine
Leo Fehrmann
Wayne Larson
Ed Voth
Barney Brundell

Kevin Powers
Steve Annis
John Krasner
John Smith
Joe Amadio

Mary Price
Anne Linder
Paula Campbell
John Linder
Lynn Vostella

Don Wonnak
Leo Towner Jr.
J. Buford Johnson
Clair Bates

FOR MORE INFORMATION — write or call the following: Steve Palatine, 1000 E. Hennepin Ave., Minneapolis, MN 55415; Kay Hatfield, 1000 E. Hennepin Ave., Minneapolis, MN 55415; J. Buford Johnson, 1000 E. Hennepin Ave., Minneapolis, MN 55415; Bill Eugen, 1000 E. Hennepin Ave., Minneapolis, MN 55415.

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BOB SHORT

Knows about this Ad...He advised against 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 advise 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 credit to the Twin Cities and the hospitality 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.



ATTACHMENT II
2 pages

GOVT. EXHIBIT 3. (Gates)
6 22-79
7.5 W

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

ATTACHMENT III (pg 1)
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]

1934
PD

Job No.

1239

"Just Plain DFL Folks" - November 6, 1978

\$3,004.01

2691.52

958.86

\$ 6654.39

6007 EXHIBIT 4
(Gates)
622-79
T.S.W.

83040410936

SHORT FOR U.S. SENATE
VOLUNTEER COMMITTEE

11/27 1978

17-116
010

1934

PAY TO THE ORDER OF JEP & 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

51

1001934 091001157 1046136

0000665439

01	ACCOUNT NUM	104-6136	LIST OF CHECKS	DATE	12/12/78	PAGE	1	AMOUNT	BATCH
BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT	BATCH	AMOUNT
0094	4,950.00	0114	65.96	0116	7,109.77	0160	34.00	0162	507.00
0223	1,376.97	0264	7,154.92	0265	114.16	0275	114.17	0271	440.67
0305	535.26	0853	6,656.39						

TOTAL NUMBER OF ITEMS 12 TOTAL DOLLAR AMOUNT 28,674.11

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
1911 276-5524
TELEX 22350 ORVAM E

DAVID BURLINGAME
MARTIN M. BERLINER
SUITE 560, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 873-7737

September 15, 1979

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER
MICHAEL E. McGUIRE
RICHARD L. HOST
KENNETH B. JONES, JR.
ROBERT J. CHRISTIANSON, JR.
CHARLES B. FARUHE
FRANK J. WALZ
JAMES R. DORSEY
ANDREW J. SHEA
DOUGLAS M. McMILLAN
CHARLES Q. REITE
WILLIAM R. MCGRANN
WALTER C. PARRINS
MICHAEL M. WHALEN
KENT E. RICHET
JOHN J. SOMMERVILLE
JAMES A. RUBENSTEIN
NANCY F. FOWLER
CHARLES T. NIXON
JEREMIAH J. KEARNEY
THOMAS R. SHERAN
JOHN A. BURTON, JR.
ROBERT A. BRUNIG

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL:
F. JAVIER FABREGAT

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

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JOSEPH E. DILLON
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HOWARD O. FELDMAN
DAVID R. MELINCOFF
DELANCEY W. DAVIS
RICHARD O. MORGAN
PHILIP R. HOCHBERG
THOMAS V. VAKERIC
DOUGLAS M. CARNIVAL
TERENCE P. BOYLE
HOPE S. FOSTER
BRIAN P. RHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. GONLON
DONALD S. ARBOUR
LAWRENCE A. JONES
PETER C. KISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON K. GAYER

RALPH F. BERLOW (1923-1972)

OF COUNSEL:
JOSEPH F. CASTIELLO
FRED O. THOMPSON
JOHN H. HOLLOMAN

*NOT MEMBER OF MINNESOTA BAR

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 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 Johansen
of your staff. If you will recall, during the investi-
gation, it became apparent that late in November 1978
the Short Committee paid an invoice of J.F.P. & Asso-
ciates, Inc., a Duluth advertising agency, which was
directed to the Just a Bunch Committee. At his depo-
sition, 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. 52-57; Gov't. Exs. 3, 4.]

Following his deposition, I asked Fred Gates
to direct a letter to J.F.P. to request an acknowledg-
ment 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

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Mr. William C. Oldaker
Page 2
September 15, 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
Frank J. Walz

FJW:emw

enclosures

83040410968

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:

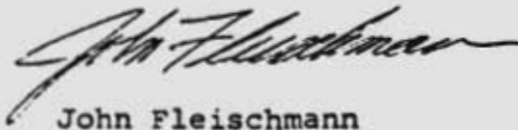
Upon receipt of your July 16th letter concerning invoice number 10473, we have checked back into our records and verify the fact that this invoice was addressed to "Just A Bunch Of DFL Folks Who Want Common Sense Government Committee."

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

83040110969

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

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DOUGLAS M. CARNIVAL*
TERENCE R. BOYLE*
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WILLIAM C. 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

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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
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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

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Mr. William C. Oldaker
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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

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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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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

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Mr. William C. Oldaker
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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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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.

83040410978

Mr. William C. Oldaker
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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.

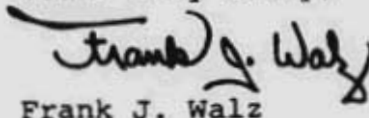
In summary, the expenditures made by the Just a Bunch Committee and the Employees Committee were made independently from, and not at the instance or suggestion, express or implied, of the Short Committee and/or Mr. Short. The individuals involved, whether friends, relatives or employees of Mr. Short,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

Mr. William C. Oldaker
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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

33040410931



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812

Dear Mr. Walz:

On , 1979, the Commission determined there is no reasonable cause to believe that your client, the Short for Senate Committee of Volunteers has violated 2 U.S.C. § 441b, § 434(b) 11 C.F.R. § 110.9(a). Accordingly, the Commission has closed its file in this matter as it pertains to Robert Short's principal campaign committee.

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

Sincerely,

William C. Oldaker
General Counsel

304011093



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas V. Swanson, Assistant Treasurer
R. E. Short Company
215 South Eleventh Street
Minneapolis, Minnesota 55403

Re: MUR 812

Dear Mr. Swanson:

This is in reference to the Commission's previous finding of reason to believe that you may have violated 2 U.S.C. § 441b concerning possible corporate contributions to the Robert E. Short Campaign.

After conducting an investigation of this matter, the Commission determined, on , 1979, that there is no reasonable cause to believe you have violated 2 U.S.C. § 441b. Accordingly, the Commission has closed its file in this matter as it pertains to you.

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

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *m*
DATE: OCTOBER 1, 1979
SUBJECT: MURs 812 and 853 - Interim Investigatory
Report dated 9-27-79; Received in
OCS 9-28-79, 10:14

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 3:45, September 28, 1979.

There were no objections to the Interim Investigatory Report at the time of the deadline.

33040-1093

September 28, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812 and 853

Please have the attached Interim Invest Report on
MURs 812 and 853 distributed to the Commission.

Thank you.

8304011093

BEFORE THE FEDERAL ELECTION COMMISSION
September 27, 1979

79 SEP 28 A10: 14

In the Matter of)
)
Just a Bunch of Plain DFL Folks)
Who Want Common Sense Government)
Committee)
)
Employees of Bob Short)
Companies Committee)
)
Short for Senate Committee)
of Volunteers)
)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate)

MURs 812 and 853

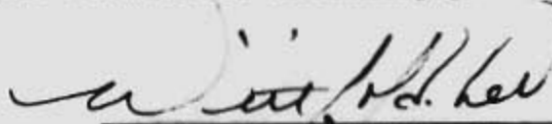
Interim Investigatory Report

The Office of General Counsel is currently in the process of preparing the final draft General Counsel's Report incorporating documents and testimony received in connection with our investigation of the above-referenced matters.

Prior to making our final recommendation to the Commission, we have determined that we should require a written statement from Brian Short in connection with the principal committee's payment of an invoice billed to the Just a Bunch Committee in order that the record be complete.

We expect to receive a written statement from Brian Short within ten days and will report to the Commission accordingly.

DATE: 9/27/79


William C. Oldaker
General Counsel

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GCC # 11146

RECEIVED
GENERAL COUNSEL

904150

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

(91) 276-5524

TELEX 22350 ORVAM E

DAVID BURLINGAME

MARTIN M. BERLINER

SUITE 560, ONE PARK CENTRAL

1515 ARAPAHOE STREET

DENVER, COLORADO 80202

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WASHINGTON, D.C. 20006
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JOSEPH E. DILLON

THOMAS H. QUINN

HOWARD G. FELDMAN

DAVID R. MELINGOFF

DELANCEY W. DAVIS

RICHARD C. MORGAN

PHILIP R. HOCHBERG

THOMAS V. VAREKIS

DOUGLAS M. CARNIVAL

TERENCE P. BOYLE

WOPR S. FOSTER

BRIAN P. PHELAN

THOMAS R. JOLLY

MICHAEL J. CONLON

DONALD S. ARBOUR

LAWRENCE A. JONES

PETER C. RISSEL

CAROL N. PARK

JOSEPH E. PATTISON

CHARLES W. GARRISON

GORDON A. GAYER

RALPH F. BERLOW (1923-1972)

OF COUNSEL

JOSEPH F. CASTIELLO

FRED D. THOMPSON

JOHN H. HOLLOMAN

NOT MEMBER OF MINNESOTA BAR

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, III
CHARLES B. FAGORE
FRANK J. WALZ
JAMES R. DORSEY
ANDREW J. SHEA
DOUGLAS M. McMILLAN
CHARLES O. REITE
WILLIAM R. MCGRAW
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 (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:

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 Johansen
of your staff. If you will recall, during the investi-
gation, it became apparent that late in November 1978
the Short Committee paid an invoice of J.F.P. & Asso-
ciates, Inc., a Duluth advertising agency, which was
directed to the Just a Bunch Committee. At his depo-
sition, 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. 52-57; Gov't. Exs. 3, 4.]

Following his deposition, I asked Fred Gates
to direct a letter to J.F.P. to request an acknowledg-
ment 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

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Mr. William C. Oldaker
Page 2
September 15, 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

Frank J. Walz

FJW:emw

enclosures

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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:

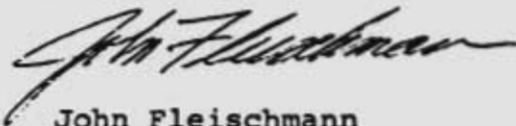
Upon receipt of your July 16th letter concerning invoice number 10473, we have checked back into our records and verify the fact that this invoice was addressed to "Just A Bunch Of DFL Folks Who Want Common Sense Government Committee."

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

83040410939

O'CONNOR & HANNAN

ATTORNEYS AT LAW

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80 SOUTH EIGHTH STREET
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TELEX 29-0584

TELECOPIER 612 341-3800 (256)

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WILLIAM C. 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

Mr. William C. Oldaker
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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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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

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Mr. William C. Oldaker
Page 4
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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

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Mr. William C. Oldaker
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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

Mr. William C. Oldaker
Page 6
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,

3304041092

Mr. William C. Oldaker
Page 7
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

33040410902

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
Page 9
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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Mr. William C. Oldaker
Page 11
September 15, 1979

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.]

83040411000
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.

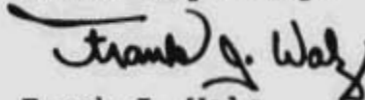
In summary, the expenditures made by the Just a Bunch Committee and the Employees Committee were made independently from, and not at the instance or suggestion, express or implied, of the Short Committee and/or Mr. Short. The individuals involved, whether friends, relatives or employees of Mr. Short,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

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SEP 16

83 002



from — O'CONNOR & HANNAN
THIRTY EIGHTH FLOOR IDS TOWER
38 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

William F. Oldaker
Federal Reserve
Section Commission
New Street NW
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: SEPTEMBER 6, 1979

SUBJECT: MUR 812 and 853 - Interim Investigatory
Report dated 8-31-79; Signed by GC
9-4-79; Received in OCS 9-5-79,
9:56

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, September 5, 1979.

There were no objections to the Interim Investigatory Report at the time of the deadline.

8304041100

September 5, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 812 and 853

Please have the attached Interim Invest Report on
MUR 812 and 853 distributed to the Commission.

Thank you.

3304011100

BEFORE THE FEDERAL ELECTION COMMISSION
August 31, 1979

79 SEP 5 49:56

In the Matter of)
)
)
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
)
Employees of Bob Short)
Companies Committee)
)
Short for Senate Committee)
of Volunteers)
)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate)
)
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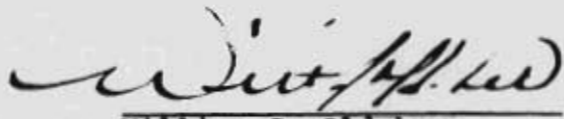
MUR 812 and 853

Interim Investigatory Report

The Office of General Counsel is currently in the process of preparing the final draft General Counsel's Report incorporating documents and testimony received in connection with our investigation of the above-referenced matters.

We will report our findings to the Commission shortly.

DATE: 9/4/79


William C. Oldaker
General Counsel

83040411003



FEDERAL ELECTION COMMISSION

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

August 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks Who
Want Common Sense Government
Committee
314 Minnesota Blvd.
St. Paul, MN 55101

MURs: 812 and 853

Dear Mr. Popovich:

Pursuant to your request at your deposition, I am enclosing a copy of the Commission's notification letters sent to Donald Wozniak on December 21, 1978, advising him of the initiation and basis of a Commission investigation concerning activities of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee.

If you have any questions concerning the above referenced matter, please contact Suzanne Callahan at 202/523-4529.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosures

Two letters and attachments dated December 21, 1978

83040411007

CALLAHAN MIIR 812 and 853

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:
 Peter Popovich
 314 Minnesota Blvd.
 St. Paul, MN 55101

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

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
Paula Ratun

4 DATE OF DELIVERY
 SEP 10 1979

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE

POST OFFICE
 SEP 10 1979
 CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *note by me*

DATE: AUGUST 9, 1979

SUBJECT: MURs 812, 818, 853 - Interim Investigatory
Report dated 8-7-79, signed by GC 8-6-79
Received by OCS 8-7-79, 5:06

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 11:00, August 8, 1979.

There were no objections to the Interim Investigatory Report at the time of the deadline.

83040411008

August 7, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818, 853

Please have the attached Interim Invest Report on
the above captioned MURs distributed to the Commission.

Thank you.

83040411005

BEFORE THE FEDERAL ELECTION COMMISSION

August 7, 1979

'9 AUG 7 P 5: 06

In the Matter of

Just a Bunch of Plain DFL
Folks Who Want Common Sense
Government Committee

Employees of Bob Short
Companies Committee

Short for Senate Committee
of Volunteers

Democrats, Republicans, and
Independents United for a
Pro-Life Senate

MURs 812, 818 and 853

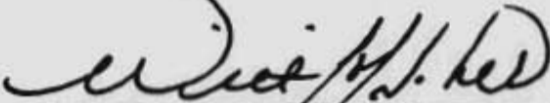
Interim Investigatory Report

The Office of General Counsel has completed its investigation of the above-referenced matters.

This Office is currently in the process of preparing a General Counsel's Report incorporating documents and testimony received in connection with our investigation. We will report our findings to the Commission shortly.

Date

8/6/79


William C. Oldaker
General Counsel

83040411010

ACC 10697

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ATTORNEYS AT LAW

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(91) 276-5524
TELEX 22350 ORVAM E++

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MARTIN M. BERLINER+
SUITE 500, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 573-7737

July 24, 1979

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. MCCOY
RICHARD L. POST
KENNETH S. JONES, JR.
ROBERT J. CHRISTIANSON, JR.
CHARLES S. FAOHE
FRANK J. WALZ
JAMES R. DORSET
ANDREW J. SHEA
DOUGLAS M. McMILLAN
CHARLES D. REITE
WILLIAM R. MCGRANN
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MICHAEL M. WHALEN
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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 (1918-1970)

LOCAL COUNSEL+
F. JAVIER FABREGAT+

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WASHINGTON, D.C. 20006
(202) 785-8700

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JOSEPH E. DILLON
THOMAS H. QUINN+
HOWARD G. FELDMAN+
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BRIAN P. PHELAN+
THOMAS R. JOLLY+
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DONALD S. ARBOUR+
LAWRENCE A. JONES+
PETER C. KISSEL+
CAROL N. PARK+
JOSEPH E. PATTISON+
CHARLES W. GARRISON+
GORDON K. GAYER+

RALPH F. BERLOW (1923-1972)

OF COUNSEL
JOSEPH F. CASTIELLO+
FRED O. THOMPSON+
JOHN H. HOLLOMAN III+

+NOT MEMBER OF MINNESOTA BAR

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

Re: MURs 812, 818 and 853

Dear Mr. Oldaker:

It has been approximately one month since your associates, Mr. Johansen and Ms. Callahan, and you concluded the depositions of several individuals associated with the Short for Senate Committee of Volunteers and its affiliated committee, Democrats, Republicans and Independents United for a Pro Life Senate, here in Minneapolis. We received the transcripts of those depositions late last week.

It is my understanding, based on our conversation at the conclusion of the depositions, that you will now proceed to prepare a report and recommendation to the Commissioners. It is my further understanding that under your procedures we will not receive a copy of the report and recommendations, as counsel for the committee and individuals, but that we are free to make a written submission of our own, which could be presented to the Commissioners for consideration along with the staff report.

Assuming my understandings to be correct, I would appreciate some indication from you as to the anticipated timetable for the preparation and submission of your report and recommendations. It would also be most helpful if we could receive some indication of what you and your staff believe to be the more important issues remaining concerning the committees and individuals deposed, now that the testimony has been taken. Please advise.

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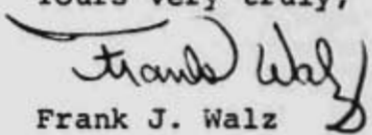
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Mr. William C. Oldaker
July 24, 1979
Page Two

Next, if there are any open items of a discovery nature, I would appreciate being notified of them, so that we may complete the record.

Finally, enclosed please find our statement for copying charges for the documents copied for Mr. Johansen and Ms. Callahan at their request.

Yours very truly,


Frank J. Walz

FJW/dj
Enclosure

P.S. I have not yet received a response to my letter to you of June 18, 1979, which enclosed separate letters of June 15 from Messrs. Wozniak and Popovich. If you do not intend to respond, please so advise.

FJW

33040411012

IN ACCOUNT WITH
O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

July 24, 1979

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

Attention: Mr. William C. Oldaker
General Counsel

Re: MURs 812, 818 and 853

Photocopying charges: 308 copies at \$.15 each

\$ 46.20

TOTAL:

\$ 46.20

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ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402



RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 27 AM 9:10

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

812
July 25, 1979

Frank J. Walz
O'Connor & Hannan Law Office
Thirty-Eight Floor, I D S Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Dear Mr. Walz:

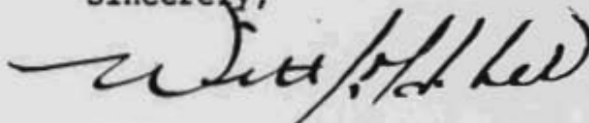
On June 21, 1979, at the conclusion of the depositions of your clients in Minneapolis, Minnesota, you requested to know when you might respond regarding the issues which have been raised in MUR's 812, 818, and 853. As you are aware 2 U.S.C. § 437g(a)(4) provides that any respondent who is the subject of a complaint shall have "a reasonable opportunity to demonstrate that no action should be taken" by the Commission. The General Counsel's Office has for the most part completed its investigation of this matter and we anticipate making a report with a recommendation to the Commission within thirty days. We would appreciate your response as soon as possible in order that the Commission can have the benefit of your position in its consideration of this matter.

During our discussions in Minneapolis you also requested that I respond to your letter of June 18, 1979. It was my opinion that the Just A Bunch Of Plain DFL Folks Who Want Common Sense Government Committee and the Short for Senate Committee of Volunteers had differing legal positions and representation of both of those committees by the same counsel could result in a conflict of interest problem. In past investigations this has been an area of concern to the Commission. Contrary to what you implied in your letter, I can assure you that in raising this issue I did not intend to imply that the two committees had violated the FECA. Further, as you are well aware, it is the Commission and not the Office of General Counsel which determines whether or not

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a violation of the FECA has occurred. Finally, regarding your comments that by my raising the conflict of interest problem I called into question your legal ethics, I can only state that I have no reason to believe that you do not conduct your practice according to the strictest ethical standards. My association with you during the depositions in June was one of respect and of high regard for your practice of the law.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", written in a cursive style.

William C. Oldaker
General Counsel

83040411016



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MJE luy fe*
DATE: JULY 18, 1979
SUBJECT: MURs 812, 818, and 953 - Interim
Investigatory Report dated 7-18-79:
Signed 7-16-79: Received in OCS
7-16-79, 2:33

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 11:00, July 17, 1979.

There were no objections to the Interim
Investigatory Report at the time of the deadline.

83040411017

July 16, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818, 853

Please have the attached Interim Invest Report
distributed to the Commission.

Thank you.

93040411012

BEFORE THE FEDERAL ELECTION COMMISSION
July 18, 1979

79 JUL 16 P 2: 33

In the Matter of)

Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)

Employees of Bob Short)
Companies Committee)

Short for Senate Committee)
of Volunteers)

Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate)

MURs 812,818, and 853

Interim Investigatory Report

The Office of General Counsel has scheduled depositions in connection with the above-referenced matters for July 20, 1979.

We expect the testimony of the depositions to complete our investigatory file in this matter and we anticipate recommending further action to the Commission subsequent to our receipt of the deposition transcripts.

DATE: 7/16/79

William C. Oldaker
General Counsel

33040411013

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402 '79

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TELECOPIER 612 341-3800 (256)

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MARTIN M. BERLINER
SUITE 560, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 573-7737

July 10, 1979

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. MCQUIRE
RICHARD L. POST
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KENT E. RICHET
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JAMES A. RUBENSTEIN
NANCY F. FOWLER
CHARLES T. NIXON
JEREMIAH J. KEARNEY
THOMAS R. SHERAN
JOHN A. BURTON, JR.
ROBERT A. BRUNIG

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL**
F. JAVIER FABREGAT*

812-4818
8107
10649
RECEIVED
FEDERAL ELECTION
COMMISSION
PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 765-8700

JUL 12 PM 12:09

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
JOHN J. FLYNN
HAROLD HALPER
JOSEPH M. DILLON
THOMAS M. QUINN
HOWARD G. FELDMAN
DAVID R. MELINCOFF
DELANCEY W. DAVIS
RICHARD G. MORGAN
PHILIP R. HOCHBERG
THOMAS V. VAKERIC
DOUGLAS M. CARNIVAL
TERENCE P. BOYLE
HOPE S. FOSTER
BRIAN P. PHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
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DONALD S. ARBOUR
LAWRENCE A. JONES
PETER C. KISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON K. GAYEN

RALPH F. BERLOW (1923-1972)

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

*NOT MEMBER OF MINNESOTA BAR

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

90302

Dear Ms. Callahan:

Pursuant to our telephone conversations,
enclosed is our check number 68446 in the amount of
\$2.00 payable to the Federal Election Commission re-
presenting the \$2.00 shortage in return of air fare
reimbursement.

Yours very truly,

Elizabeth M. Walstrom

(Mrs.) Elizabeth M. Walstrom
Secretary to Frank J. Walz

emw

enclosure

33040411022

83040411021

68446

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

17-115
x 910

7/9 1979

\$2.00

DOLLARS

PAY TO THE ORDER OF Federal Election Commission

EXACTLY \$2 AND 00/100



NATIONAL CITY BANK
OF MINNEAPOLIS
MINNEAPOLIS, MINNESOTA 55480

O'CONNOR & HANNAN

Edna E. Hannan

⑆068446⑆ ⑆091001157⑆ ⑆01⑆3815⑆

O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
9 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

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

79 JUL 12 PM 12:09

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FEDERAL ELECTION
COMMISSION

83040411



FEDERAL ELECTION COMMISSION

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

July 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
Minneapolis, Minnesota 55101

Re: MURs 812 and 853

Dear Mr. Wozniak:

This letter is to confirm your rescheduled appearance for deposition pursuant to the Commission subpoena issued to you on April 2, 1979.

Your appearance has been rescheduled for July 20, 1979, as you have indicated to my staff that this date is convenient for you. Your deposition will be taken at 10:30 a.m., U.S. Courthouse room 446. Should room 446 be locked, please wait there for Suzanne Callahan to meet you as we do not have a room assignment at this time.

Please advise this office prior to July 20th whether you have any records in your possession which are to be produced pursuant to the above referenced subpoena. Additionally, please confirm your appearance via letter within 48 hours after your receipt of this notification.

Should 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 "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

July 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich
413 Minnesota Blvd.
St. Paul, Minnesota 55101

Re: MURs 812 and 853

Dear Mr. Popovich:

This letter is to confirm your rescheduled appearance for deposition pursuant to the Commission subpoena issued to you on April 23, 1979.

Your appearance has been rescheduled for July 20, 1979, as you have indicated to my staff that this date is convenient for you. Your deposition will be taken at 9:00 a.m., U.S. Courthouse room 446. Should room 446 be locked, please wait there for Suzanne Callahan to meet you as we do not have a room assignment at this time.

Please advise this office prior to July 20th whether you have any records in your possession which are to be produced pursuant to the above referenced subpoena. Additionally, please confirm your appearance via letter within 48 hours after your receipt of this notification.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: JULY 2, 1979
SUBJECT: MURs 812, 818, 853 - Interim
Investigatory Report dated 6-26-79:
Signed by GC 6-28-79: Received in
OCS 6-29-79, 7:41

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 2:00, Friday, June 29, 1979.

There were no objections to the Interim Investigatory
Report at the time of the deadline.

33040411025

June 28, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT; MURs 812, 818, 853

Please have the attached Interim Invest Report o
distributed to the Commission.

Thank you.

33040411022

BEFORE THE FEDERAL ELECTION COMMISSION
June 26, 1979

RECEIVED
JUN 29 4 7: 41
CLERK

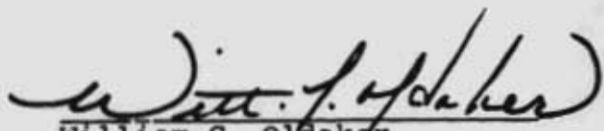
In the Matter of)
)
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee) MURs 812,818, and 853
Employees of Bob Short Companies)
Committee)
Short for Senate Committee of)
Volunteers)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

Interim Investigatory Report

During the week of June 18th through June 22, 1979, depositions were taken of seven individuals in connection with the above-referenced matters. The Office of General Counsel is currently arranging to take two additional depositions in connection with MURs 812 and 853.

Upon receipt of the deposition transcripts, this office will review the testimony as well as the documents submitted by the deponents and will report to the Commission accordingly.

DATE: 6/28/79


William C. Oldaker
General Counsel

83040411027

N O T I C E

MURS 812,818, and 853

Because of the voluminous record in this MUR, only portions of the file have been microfilmed. The complaint, Amendment to Complaint, and staff reports (including General Counsel's Reports and memoranda to the Commission) have been microfilmed. Those portions of the file not microfilmed (including correspondence to and from respondents and persons, deposition transcripts, and documents produced) are in storage. For further information, contact the Records Manager in the Administrative Division.

83040411038

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402 11:42

(612) 341-3800

TELEX 29-0584

TELECOPIER 612 341-3800 (256)

PASEO DE LA CASTELLANA, 8
MADRID 1, SPAIN
(91) 276-5524
TELEX 22350 ORVAM E**

DAVID BURLINGAME
MARTIN M. BERLINER
SUITE 580, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 573-7737

June 18, 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. PARKINS
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 (1918-1970)

LOCAL COUNSEL**
F. JAVIER FABREGAT

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD O. FELDMAN
DAVID R. MELINCOFF
DELANCEY W. DAVIS
RICHARD G. MORGAN
PHILIP R. HOCHBERG
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LAWRENCE A. JONES
PETER C. RISSEL
CAROL N. PARK
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON R. GAYER

RALPH F. BERLOW (1923-1972)

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

**NOT MEMBER OF MINNESOTA BAR

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

Re: MURs 812 and 853

902766

Dear Mr. Oldaker:

I have your letter of June 11, 1979, both the tone and content of which are personally disturbing to me.

Particularly in light of your attitude, your precipitous action without benefit of the facts, and your obvious prejudgment of the relationship between the two committees in question and individuals associated with them, we have concluded to withdraw from further representation of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee, and Messrs. Wozniak and Popovich, as individuals associated with that committee. In all candor, we believe that you too should withdraw from further participation in the present inquiry.

I have discussed the matter with Messrs. Wozniak and Popovich, and have provided them with copies of your letter. Enclosed find copies of letters received from each of them in response, which are self-explanatory.

I wish to add a further point concerning the statements in your letter relating to the solicitation

33040411026

Mr. William C. Oldaker

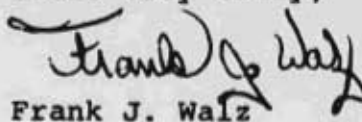
Page 2

June 18, 1979

79 JUN 20 AM 11:42

of clients by me. In the 15 years of my practice, I have never solicited the representation of a client. You owe me a written apology, and I expect it promptly.

Yours very truly,


Frank J. Walz

FJW:emw

enclosures

cc: Mr. D. D. Wozniak
Mr. Peter S. Popovich

830404111030

3 3 0 4 0 1 1 0 3 1
Fink Offices
D. D. Wozniak

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

D. D. Wozniak

Edward J. Cleary
Associate

June 15, 1979

Mr. Frank J. Walz
O'Connor & Hannan
Attorneys at Law
Thirty-Eighth Floor, IDS Tower
80 So. 8th Street
Minneapolis, MN 55402

Dear Frank:

Thank you for furnishing me copies of the letters from William C. Oldaker, General Counsel of the Federal Election Commission.

I am appalled and disturbed by his contentions. As you know, I contacted you as an expert in election laws to represent our Committee. How Mr. Oldaker could even suggest that you or any other member of your firm solicited our business is an unwarranted and idle speculation and particularly aggravating since it comes from a fellow lawyer.

The misunderstanding with Mr. Popovich is easily explainable. I believe I was subpoenaed first and told Pete that I had engaged you to represent the Committee. Thereafter, Pete was subpoenaed and he forgot who I had engaged. In view of the improper "accusations", but in fairness to you and your firm, I believe that we should engage different counsel. We will, however, require additional time before the taking of our depositions.

The above is relatively insignificant compared to my final point. I cannot conceive that any lawyer would attach any significance to legal representation in terms of the independence of our Committee. This is not only highly prejudicial, unethical, but represents a bias and prejudice which our Committee cannot and will not accept in this investigation. Accordingly, because of his prejudging the relationship between the Committee merely because of legal counsel, I strongly feel that he should withdraw from this case immediately and assign different counsel.

Please call me and let me know whether or not I should direct a letter directly to him concerning this latter point, or do you wish to do so

State Offices
D. D. Wozniak

Mr. Frank J. Walz
Page 2

June 15, 1979

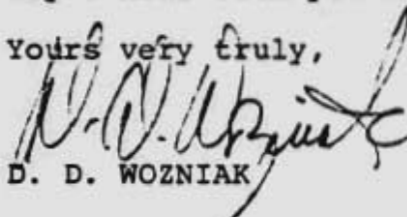
and enclose my letter and then I will take the whole of the correspondence to other counsel.

Also, how do you wish to have the continuance of my deposition handled in view of the necessity of our seeking different counsel.

I am extremely sorry about these types of accusations. It is very unfair to you and particularly disturbing to me since I have never had this happen in thirty-two years of practice of law.

May I hear from you at your first opportunity.

Yours very truly,


D. D. WOZNIAK

cc: Peter Popovich

3304041103

LAW OFFICE
Peterson, Popovich, Knutson & Flynn

PROFESSIONAL ASSOCIATION
314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101
612-222-3515

FRED N. PETERSON, JR.
PETER S. POPOVICH
JAMES E. KNUTSON
JOSEPH E. FLYNN
PAUL W. HETLAND
ROBERT A. HUGHES
PAUL C. RATWIK
THOMAS V. BENDER
JOHN M. ROSZAK
THOMAS M. SIPKINS
THOMAS S. DEANS
PATRICIA A. MALONEY

PETERSON & POPOVICH
1947.

June 15, 1979

Mr. Frank J. Walz
O'Connor & Hannan
38th Floor, IDS Center
80 South 8th Street
Minneapolis, MN 55402

Dear Mr. Walz:

Thank you for your letter of June 14 enclosing Mr.
William C. Oldaker's letter of June 11.

I am shocked at his letter. He misunderstood my state-
ment regarding your representing me. I had left it to Mr.
Wozniak to procure counsel. When I talked to the FEC people,
I obviously could not say I knew you. I later found out
that Mr. Wozniak, representing the committee, retained you
because of your expertise. Since that was in accordance
with my understanding with Mr. Wozniak to procure counsel,
the FEC people drew an improper conclusion.

I certainly wish you could continue to represent us,
but I can understand your withdrawal in view of the
prejudicial comments made by Mr. Oldaker that he views your
representation was an indication of committee affiliation.
In my opinion, he has already prejudged the issue. Recusal
is an order. Mr. Oldaker ought to withdraw from the case
as I do not believe a fair investigation is being undertaken
or will result in view of his comment.

Tell the FEC people to contact me personally.

Sincerely yours,

Peter S. Popovich
Peter S. Popovich

PSP:ds

33040411033

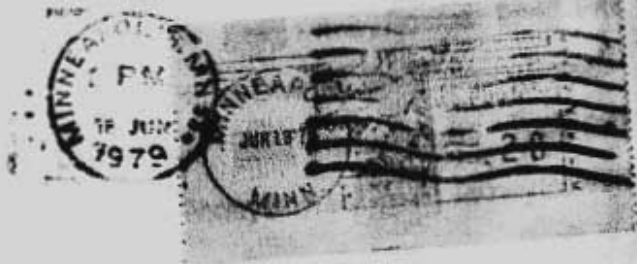
83040411034

O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

79 JUN 20 AM 11:42

MINNEAPOLIS 55402
JUN 19 1979

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





FEDERAL ELECTION COMMISSION

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

June 11, 1979

Frank J. Walz
O'Connor & Hannan Law Office
Thirty-Eight Floor, I D S Tower
80 South Eighth Street
Minneapolis, Minnesota 55402

Dear Mr. Walz:

This letter is in response to your letter of May 31, 1979, in which you indicated that you believe there to be no conflict of interest in your representing both the Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee and the Short for Senate Committee of Volunteers. As it appears that these two committees may have differing positions in this matter, I view your representation of both of them as a conflict of interest problem.

Further, in your letter you indicate that you represent Peter Popovich, Vice Chairman of the Just A Bunch Committee. Mr. Popovich told my staff on June 4, 1979, that he has never heard of you and that you do not represent him. This not only calls into question the circumstances surrounding your becoming counsel for the Just A Bunch Committee, but whether you have contacted potential clients in this matter. Because of this, we will not, as you have requested, inform you of individuals associated with the Just A Bunch Committee whom we plan to depose.

Also in your letter you stated that the Commission should attach no significance to your representation of both committees, in terms of whether the Just A Bunch Committee is in fact an independant committee

83040411036

11) *Callahan - 788* *526-51*

PS Form 3811, Jan. 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:
*Wab
 80 South 8th St
 Minneapolis, MN*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
92C846

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
3-2-81

5. ADDRESS (Complete only if required)
 POSTMARK
 MAR 2 1981
 MN
 AL

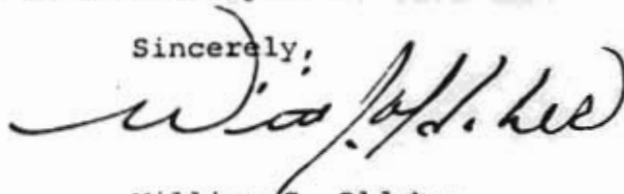
6. UNABLE TO DELIVER BECAUSE:
☐ G. ☐ D. ☐ C. ☐ S.

☆ GPO : 1979-555-045

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

and not affiliated with the Short for Senate Committee of Volunteers. I view your joint representation of both committees as indicia of their alleged affiliation and, further, as a direct contradiction to their contention that they are in fact independent entities.

Sincerely,



William C. Oldaker
General Counsel

153 *Collahan*

18 3 0 4 0 1 1 0 3 7

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

2. 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)

3. ARTICLE ADDRESSED TO:
Frank J. Walz

4. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
438124

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Erin Bone

DATE OF DELIVERY
JUN 14 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

MIN. ENCL. 5
POSTMARK
JUN 13 1979
REG.

☆GPO 1977-0-24955



FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln St., N.E.
Minneapolis, MN 55418

Re: MUR 818

Dear Mr. O'Steen:

Enclosed is a check in the amount of \$225, made payable to you for travel expenses in connection with your deposition which has been scheduled for June 14th, 2:00, at 1325 K. St. N.W., Washington, D.C.

The amount of the check was computed on the basis of \$212 round trip air fare (\$2.00 of which you have already received) plus \$15 subsistence. Please be advised that if you fly American or United Airlines at the Government's expense, you are required to submit all 50% coupons received from the airlines to the issuing agency, which in this case is the Federal Election Commission.

Should you have any questions, please direct them to Suzanne Callahan at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln St., N.E.
Minneapolis, MN 55418

Re: MUR 818

Dear Mr. O'Steen:

Enclosed is a check in the amount of \$225, made payable to you for travel expenses in connection with your deposition which has been scheduled for June 14th, 2:00, at 1325 K. St. N.W., Washington, D.C.

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Should you have any questions, please direct them to Suzanne Callahan at 202/523-4529.

W.C.O. 4/8/79
Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check





FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank Walz
Thirty-Eighth Floor
IDS Tower
80 South Eighth Street
Minneapolis, MN 55402

Re: MURs 812,818, and 853

Dear Mr. Walz:

Enclosed is a check in the amount of \$227 made payable to you for travel expenses in connection with your appearance at the deposition of David O'Steen which has been scheduled for June 14th, 2:00, at 1325 K. St. N.W., Washington D.C.

The amount of the check was computed on the basis of \$212 round trip air fare from Minneapolis to Washington, plus \$15 subsistence. Please be advised that if you fly American or United Airlines at the Government's expense, you are required to submit all 50% coupons received from the airlines to the issuing agency, which in this case is the Federal Election Commission.

Should you have any questions, please direct them to Suzanne Callahan at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check



Henry H. Cole



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank Walz
Thirty-Eighth Floor
IDS Tower
80 South Eighth Street
Minneapolis, MN 55402

Re: MURs 812,818, and 853

Dear Mr. Walz:

Enclosed is a check in the amount of \$227 made payable to you for travel expenses in connection with your appearance at the deposition of David O'Steen which has been scheduled for June 14th, 2:00, at 1325 K. St. N.W., Washington D.C.

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Should you have any questions, please direct them to Suzanne Callahan at 202/523-4529.

W.C. Oldaker
Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check





FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer
515 North Labree
Thief River Falls, MN 56701

Re: MUR 818

Dear Ms. Kremer:

Enclosed is a check in the amount of \$40, made payable to you for travel expenses in connection with your deposition which has been scheduled for June 21st, 1:30, at 446 U.S. Courthouse, Minneapolis, MN.

The amount of the check was computed on the basis of \$102 round trip air fare, \$62 of which you have already received.

Should you have any questions or if we have computed your travel expenses incorrectly, please contact Suzanne Callahan at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check



8340411045

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER

80 SOUTH EIGHTH STREET

MINNEAPOLIS, MINNESOTA 55402

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

79 JUN 4 AM 9:12

FEDERAL ELECTION
COMMISSION



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer
515 North Labree
Thief River Falls, MN 56701

Re: MUR 818

Dear Ms. Kremer:

Enclosed is a check in the amount of \$40, made payable to you for travel expenses in connection with your deposition which has been scheduled for June 21st, 1:30, at 446 U.S. Courthouse, Minneapolis, MN.

The amount of the check was computed on the basis of \$102 round trip air fare, \$62 of which you have already received.

Should you have any questions or if we have computed your travel expenses incorrectly, please contact Suzanne Callahan at 202/523-4529.

*smc
6/8/79*
Sincerely,

William C. Oldaker
General Counsel

Enclosure
Check



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) MURS 812 (78), 818,
Short for Senate Committee of Volunteers) and 853
Democrats, Republicans, Independents)
United for a Pro-Life Senate)
R. E. Short Company)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on June 5, 1979, the Commission, meeting in an executive session at which a quorum was present, adopted the recommendation of the General Counsel to authorize the payment of travel for both Mr. David O'Steen, and his attorney Frank Walz, to Washington, D. C., the week of June 11, 1979 in order that his deposition can be taken here at the Commission in connection with the above-captioned matters.

Attest:

6/6/79
Date

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

8304011101E



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *Marjorie W. Emons*
DATE: JUNE 1, 1979
SUBJECT: OBJECTION - MURs 812, 818, 853 - Memorandum
from OGC dated 5-30-79, Requesting
Travel Expenses for Mr. O'Steen and
Counsel; Received in OCS 5-31-79,
11:36

The above-named document was circulated on a 48 hour
vote basis at 3:00, May 31, 1979.

Commissioner McGarry submitted an objection at 12:45,
June 1, 1979, thereby placing the matter on the Amended
Agenda for Executive Session on June 5, 1979.

83040111013

May 31, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818, 853

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

Thank you.

33040111052



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSIONER
MAY 31 1979

79 MAY 31 All: 36

May 30, 1979

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *W.C.O.*

SUBJECT: Depositions in connection with MURs 812, 818,
and 853 (Senate Campaign of Robert Short)

The Commission has previously approved the issuance of subpoenas for deposition to ten individuals in connection with MURs 812, 818, and 853 to be taken the week of June 18, 1979.

One of the subpoenaed individuals, David O'Steen, (a participant in the activities of the Democrats, Republicans, and Independents United for a Pro-Life Senate Committee) has informed us that he is unable to appear for deposition at the time for which he has been scheduled.

Mr. O'Steen's testimony is essential to the completion of our investigation and must be taken prior to that of Fred Gates, the campaign manager of the Short for Senate Committee of Volunteers.

In order that Mr. O'Steen's testimony be taken at an appropriate time, I request that the Commission authorize the payment of travel for both Mr. O'Steen and his attorney, Frank Walz, to Washington, D.C., the week of June 11th in order that his deposition can be taken here at the Commission.

I am aware that the Commission's regulations do not provide for the payment of such travel expenses for witnesses' counsel but since Mr. O'Steen's testimony is fundamental to our completion of the other depositions, I recommend that the Commission approve this request.



900#10359

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

1911 278-5524

TELEX 22350 ORVAM E

DAVID BURLINGAME

MARTIN M. BERLINER

SUITE 560, ONE PARK CENTRAL

1515 ARAPAHOE STREET

DENVER, COLORADO 80202

(303) 573-7737

May 31, 1979

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

PATRICK J. O'CONNOR

WILLIAM T. HANNAN

JOHN J. FLYNN

H. ROBERT HALPER

JOSEPH E. DILLON

THOMAS H. QUINN

HOWARD G. PELOWAN

DAVID R. MELINCOFF

DELANCEY W. DAVIS

RICHARD G. MORGAN

PHILIP H. HOCHBERG

THOMAS V. VAREKIS

DOUGLAS M. CARNIVAL

TERENCE R. BOYLE

ROBERT S. FOSTER

BRIAN P. MUELAN

THOMAS R. JOLLY

BARRY J. CUTLER

MICHAEL J. CONLON

DONALD N. ARBOUR

LAWRENCE A. JONES

PETER C. RISSEL

CAROL N. PARR

JOSEPH E. PATTISON

CHARLES W. GARRISON

GORDON R. GAYER

RALPH F. BERLOW (1923-1972)

OF COUNSEL

JOSEPH F. CASTIELLO

FRED D. THOMPSON

JOHN H. HOLLOMAN III

NOT MEMBER OF MINNESOTA BAR

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER
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. PARKINS
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 (1918-1970)

LOCAL COUNSEL
F. JAVIER FABREGAT

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

Re: MURs 812 and 818

Dear Mr. Oldaker:

Supplementing my letter of April 4, 1979 to Mr. Whitehead of your staff, please be advised that our firm has been retained to represent Kristine Kremer and Eileen Angell, to the extent that these individuals were associated with the Short for Senate Committee of Volunteers and/or its affiliated committee, the Democrats, Republicans and Independents United for a Pro-Life Senate, in connection with the inquiry of the Federal Election Commission currently under way bearing the above captions.

As previously indicated, we also represent Messrs. Fred Gates, John Angell and David Osteen in connection with the same matters.

Yours very truly,

Frank J. Walz
Frank J. Walz

FJW:emw

8 3 3 4 0 4 1 1 0 3 3

O'CONNOR & HANNAN
ATTORNEYS AT LAW
THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MINNESOTA 55402

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

'79 JUN 4 AM 9:12

RECEIVED
FEDERAL ELECTION
COMMISSION

CPQ#
10360

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
1011 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

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 785-8700

PATRICK J. O'CONNOR
WILLIAM T. HANNAN
JOHN J. FLYNN
H. ROBERT HALPER
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
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DELANCEY W. DAVIS
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DOUGLAS M. CARNIVAL
TERENCE P. BOYLE
HOPE S. FOSTER
BRIAN P. RHELAN
THOMAS R. JOLLY
BARRY J. CUTLER
MICHAEL J. CONLON
DONALD S. ARBOUR
LAWRENCE A. JONES
PETER C. KISSEL
CAROL N. PARR
JOSEPH E. PATTISON
CHARLES W. GARRISON
GORDON K. GAYEN

RALPH F. BERLOW (1923-1972)

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

NOT MEMBER OF MINNESOTA BAR

PATRICK J. O'CONNOR
FREDERICK W. THOMAS
JOE A. WALTERS
THOMAS A. KELLER III
MICHAEL E. MCQUIRE
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. PARKINS
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. BRUNIG

WILLIAM C. KELLY (1918-1970)

LOCAL COUNSEL
F. JAVIER FABREGAT

May 31, 1979

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

Re: MURs 812 and 853

Dear Mr. Oldaker:

Confirming my series of telephone conversations with Suzanne Callahan of your staff over the past few weeks, please be advised that our firm has been retained to represent the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee, and Messrs. Donald Wozniak and Peter Popovich, to the extent that those individuals were associated with the Committee, in connection with the inquiry of the Federal Election Commission currently under way bearing the above captions.

Ms. Callahan passed along the suggestion attributed to you that we give consideration to whether a conflict of interest may be present in our representation of the above Committee, in light of our continued representation of the Short for Senate Committee of Volunteers, confirmed to you by my letter dated April 4, 1979. I can assure you that the matter was fully considered, discussed with both clients, and their consents obtained, prior to our agreement to undertake the representation of the above Committee. We perceive no conflict, actual or potential, at the present time.

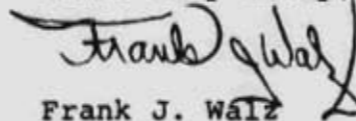
330401101

Mr. William C. Oldaker
Page 2
May 31, 1979

Perhaps more importantly, I trust that the Commission will attach no legal significance to the concurrent representation, in terms of whether the Just a Bunch Committee was in fact an independent political committee, not affiliated with the principal campaign committee authorized by Mr. Short during his 1978 senate campaign.

If you are uncomfortable about the situation in any way, I would be pleased to discuss it with you further.

Yours very truly,


Frank J. Walz

FJW:emw

B 3 0 4 0 4 1 1 0 5 3

330#
10361

LAW OFFICE

Peterson, Popovich, Knutson & Flynn

PROFESSIONAL ASSOCIATION
314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101
612-222-5515

FRED N. PETERSON, JR.
PETER S. POPOVICH
JAMES E. KNUTSON
JOSEPH E. FLYNN
PAUL W. HETLAND
ROBERT A. HUGHES
PAUL C. RATWIK
THOMAS V. BENDER
JOHN M. ROSZAK
THOMAS H. SIPKINS
THOMAS S. DEANS
PATRICIA A. MALONEY

PETERSON & POPOVICH
1947.

May 29, 1979

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

Re: MUR 812 and 853

Dear Mr. Oldaker:

I am unable to be at the deposition on Friday, June 22, 1979, because of previous commitments.

When the matter was previously postponed in accordance with a phone call from Suzanne Callahan, I asked that she contact me before another date was arbitrarily chosen. I would appreciate that being done, but this letter is in response to your letter of May 23, which was just received in our office on May 29, a copy of which is attached.

Sincerely yours,

Peter S. Popovich
Peter S. Popovich

PSP:ds

33040111036



FEDERAL ELECTION COMMISSION

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

May 23, 1979

RECEIVED

MAY 20 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks
413 Minnesota Boulevard
St. Paul, MN 55101

Re: MUR 812 and 853

Dear Mr. Popovich:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 9:00 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

cc: Frank Walz

83040411057

83040411056

Peterson, Popovich, Knutson & Flynn, P.A.

314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101



POSTAGE PAID
SCULAR
PHY
MDAA

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

REPORT OF INDEPENDENT EXPENDITURES
OR CONTRIBUTIONS BY PERSON

REC
10175

(To be used by an individual or a person other than political committee)

1. (a) Name (in full) "GROUP OF PERSONS" REG #1093(BX1) I.E. MN. NATIONAL DEMOCRATIC DELEGATES AND OTHER DEMOCRATS IN MINN		2. Identification Number No I.D. # ISSUED	
(b) Address (number and street) TO COMPLY WITH MN. STATUTE MY NAME KEVIN POWERS WAS PLACED AT BOTTOM 735 EASTCOUNTRY ROAD B OF AD		3. This is an Independent Expenditure: ☒ in support of Federal candidate, 2:33 ☐ in opposition to Federal candidate.	
(c) City, State and ZIP Code ST. PAUL MINN. 55117		(e) Occupation DOES NOT APPLY	
(d) Principal Place of Business DOES NOT APPLY			
4. Type of Report (check appropriate box and complete) THIS REPORT BEING (MAILED) FILED WITH FEDERAL ELECTION COMMISSION, WASHINGTON DC. (a) ☐ Amendment for _____ (which report) (b) ☐ April 10 Quarterly Report (c) ☐ July 10 Quarterly Report (d) ☐ October 10 Quarterly Report (e) ☐ January 31 Year End Report (f) ☐ Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date) (g) ☐ Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)			
5. This report covers the period OCT. 1978 through PRESENT (COVERS ONLY EXPENDITURE MADE) FINAL			
Complete either Line 6 or Line 7 whichever is appropriate. CONTRIBUTIONS			
6. Full Name, Mailing Address and ZIP Code of Payee Particular of Expenditure Date (month, day, year) Amount Name and Office Sought of Federal Candidate			
7. Full Name, Mailing Address and ZIP Code of Payee Particular of Expenditure Date (month, day, year) Amount Name and Office Sought of Federal Candidate			
8. TOTAL CONTRIBUTIONS \$			
9. TOTAL EXPENDITURES \$ 686.40			
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 suggestions 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.			
Signature Kevin C. Powers		Date May 8, 1979	
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437c or Section 441. (See reverse side of form).		Subscribed and sworn to before me this 8th day of MAY 1979 My Commission expires: 4-30-82 James Bacigalupo	
For further information Contact:		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.	

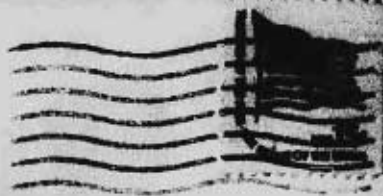
* I did not see that much of Mr. Short's Campaign material, but to the best of my knowledge, the information in this ad did not appear in any other Campaign material of Mr. Short, it was not repeated anywhere else. Kevin Powers

435 E. Co. Rd. B.
St. Paul, Minn 55117

83040411060

RECEIVED
FEDERAL ELECTION
COMMISSION

79 MAY 21 PM 2:33



Federal Election Commission
1325 K. St. N.W.
Washington D.C. 20463
att. Ms. Suzanne Callahan

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 812 and 853
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
Employees of Bob Short)
Companies Committee)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 8, 1979, the Commission approved the recommendation, as set forth in the General Counsel's Memorandum, dated May 4, 1979, to issue subpoenas to Brian Short and James Rice to facilitate the investigation of the above-captioned matter.

The vote in this matter was 6-0 with Commissioners Aikens, Friedersdorf, Harris, McGarry, Thomson, and Tiernan voting for the determination.

Attest:

5/8/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 5-4-79, 2:49 , Friday
Circulated on 48 hour vote basis: 5-7-79, 12:00, Monday

83040111051

May 4, 1979

MEMORANDMM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812 and 853

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

Thank you.

33040411052



FEDERAL ELECTION COMMISSION

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

79 MAY 4 4 2: 49

May 4, 1979

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *WCO*

SUBJECT: Subpoenas in connection with MURs 812 and 853

The Commission has previously approved the issuance of subpoenas for deposition to the following individuals in connection with the above referenced MURs:

Fred L. Gates
John Ancell
Donald Wozniak
Oscar Molomot
David O'Steen
Eileen Angell
Douglas Swanson
Leo Tibesar
Kristine Kremer
Peter Popovich

This office has received additional information which indicates that Brian Short and James Rice should also be deposed. Their connection with the investigation is as follows:

Brian Short: Active in the Short for Senate Committee of Volunteers, the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and possibly, the Employees of Bob Short Companies Committee

James Rice: Vice Chariman of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and paid consultant to the Short for Senate Committee of Volunteers

The Office of General Counsel recommends that the Commission authorize the issuance of subpoenas to Brian Short and James Rice to facilitate the investigation of MURs 812 and 853.



AUTHORIZATION TO ISSUE SUBPOENAS TO FACILITATE
THE INVESTIGATION OF MURs 812 and 853

The Commission hereby authorizes subpoenas to be issued
to the following individuals:

Brian Short
James Rice

Joan D. Aikens, Chairman

Vernon W. Thomson, Commissioner

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

John W. McGarry, Commissioner

Max . Friedersdorf, Commissioner

33040

33040411053

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

MUR- 812-812-853

● 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:
Bob Cruller
Assoc. Reporters

3 ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>743142</i>	

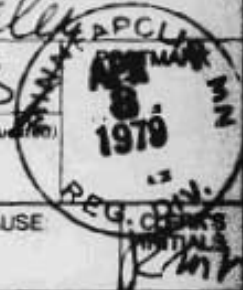
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
Bob Cruller

4 DATE OF DELIVERY
4-3

5 ADDRESS (Complete only if required)

6 UNABLE TO DELIVER BECAUSE



☆GPO 1977-0-248-000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

POSTAGE AND FEES PAID



UNCLAIMED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

NOTICE

UNCLAIMED

RR
CERTIFIED

943792

83240+1101817



MAC NOTICE

UNCLAIMED

CERTIFIED

943792

83040416008

HUR 815

PS Form 3876, Apr. 1977

1. FROM: Complete items 1, 2, and 3
 Tell your address in the "RETURN TO" space on
 the back.

2. ARTICLE ADDRESSED TO:
John Angel

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

4. DATE OF DELIVERY: *APR 1977*

5. ADDRESS: (Complete only if requested)

6. UNABLE TO DELIVER REASON:

7. CLAIMS ARTICLE

8. POSTMARK

9. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

10. I have received this article described above.

11. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

12. RETURN TO: (Complete only if requested)

13. ADDRESSEE: (Complete only if requested)

14. UNABLE TO DELIVER REASON:

15. CLAIMS ARTICLE

16. POSTMARK

17. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

18. I have received this article described above.

19. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

20. RETURN TO: (Complete only if requested)

21. ADDRESSEE: (Complete only if requested)

22. UNABLE TO DELIVER REASON:

23. CLAIMS ARTICLE

24. POSTMARK

25. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

26. I have received this article described above.

27. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

28. RETURN TO: (Complete only if requested)

29. ADDRESSEE: (Complete only if requested)

30. UNABLE TO DELIVER REASON:

31. CLAIMS ARTICLE

32. POSTMARK

33. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

34. I have received this article described above.

35. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

36. RETURN TO: (Complete only if requested)

37. ADDRESSEE: (Complete only if requested)

38. UNABLE TO DELIVER REASON:

39. CLAIMS ARTICLE

40. POSTMARK

41. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

42. I have received this article described above.

43. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

44. RETURN TO: (Complete only if requested)

45. ADDRESSEE: (Complete only if requested)

46. UNABLE TO DELIVER REASON:

47. CLAIMS ARTICLE

48. POSTMARK

49. SIGNATURE: *[Signature]* ☒ Addressee ☐ Authorized agent

50. I have received this article described above.

830401106
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Mr. Douglas V. Swanson, Treasurer
Robert E. Short Company
215 South 11th Street
Minneapolis, Minnesota 55403

~~CERTIFIED MAIL
RETURN RECEIPT REQUESTED~~

Federal Express

83040411070

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20460

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Ms. Eileen Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

UNCLAIMED

CERTIFIED

943791

FINAL NOTICE

20

WINNEAPPI

83040411071

PA 1000-0013, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1997

2. ACTION IS REQUIRED TO

NOVEMBER 1997

www.oxfordjournals.org

DAVID W. BROWN, JR.

[illegible]

A. UNABLE TO CONTACT CREDITORS

*Dates were changed letters
were not sent until 4/24/79.*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Re: MUR 812 and 818

Dear Mr. Gates:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 3, 1979, beginning at 11:00 a.m. and continuing each day thereafter as necessary.

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

WJC
4/23/79
Sincerely,

William C. Oldaker
General Counsel

SC/cah
4/18/79

3304011107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 812 and 853

Dear Mr. Wozniak:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 1, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

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

Cmc
4/22/79
Sincerely,

William C. Oldaker
General Counsel

SC/cah
4/18/79

83040411073

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Osteen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

Re: MUR 818

Dear Mr. Osteen:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 3, 1979, beginning at 9:00 a.m. and continuing each day thereafter as necessary.

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

SC
4/23/79
Sincerely,

William C. Oldaker
General Counsel

SC/cah
4/18/79

3304041107:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Douglas V. Swanson, Treasurer
Robert E. Short Company
215 South 11th Street
Minneapolis, Minnesota 55403

Re:

Dear Mr. Swanson:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

4/25/79
Sincerely,

William C. Oldaker
General Counsel

Enclosure

3304011107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re:

Dear Mr. Tibesar:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

4/29/79
Sincerely,

William C. Oldaker
General Counsel

Enclosure

83040-11078

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer, Chairperson
Democrats, Republicans and Independents
United for a Pro-Life Senate
515 North Labree
Thief River Falls, Minnesota 56701

Re:

Dear Ms. Kremer:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

File 4-31-91
Sincerely,

William C. Oldaker
General Counsel

Enclosure

33040111077

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Eileen M. Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

Re:

Dear Ms. Angell:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

*WAC
9/23/79*
Sincerely,

William C. Oldaker
General Counsel

Enclosure

83040411079

83040411075

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government Committee
314 Minnesota Boulevard
St. Paul, Minnesota 55101

Re:

Dear Mr. Popovich:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Mr. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, we have determined that your appearance should be reconvened.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 2, 1979 beginning at 4:00 p.m. and continuing each day thereafter as necessary.

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

Cmc
4/23/79

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Mr. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, we have determined that your appearance should be reconvened.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 7, 1979 beginning at 4:00 p.m. and continuing each day thereafter as necessary.

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

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 812 and 853

Dear Mr. Wozniak:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 9, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

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

Sincerely,

William C. Oldaker
General Counsel



33040411032



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Osteen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

Re: MUR 818

Dear Mr. Osteen:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 8, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

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

Sincerely,

William C. Oldaker
General Counsel



33040411035



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Re: MUR 812 and 818

Dear Mr. Gates:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 8, 1979, beginning at 4:00 p.m. and continuing each day thereafter as necessary.

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

Sincerely,

William C. Oldaker
General Counsel

8304041103



SYMBOL 3004

4 1 1 0 3

United States Treasury

15-51
000

DIVISION OF
TREASURY



PAY TO THE

ORDER OF LEO YIBESAR

MONTH	DAY	YEAR
04	20	79

95350001

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FE9AW261

DOLLARS	CTS
\$000032	00

F E C
WASH DC
W9136

U S T R E A S U R Y
Henry H. Eades
REGIONAL DISBURSING OFFICER

DO NOT FOLD, SPINDE OR MUTILATE
KNOW YOUR ENDORSEMENT - REQUIRE IDENTIFICATION

3004 1 0000000511 156616677



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812

Dear Mr. Tibesar:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure



83040411032

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Mr. Leo Tibesar, Jr.
2260 Summit Avenue
St. Paul, Minnesota 55105

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 9, 1979 beginning at 4:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on April 30, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain in any way whatever to your activities or other persons activities on behalf of the Senate candidacy of Robert Short.

(b) Contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with the Senate candidacy of Robert Short in any capacity whatever.

33040-111037

Subpoea to Tibesar

- 2 -

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set her hand at Washington, D.C., this *23rd*
day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

3304041103

DIVISION OF
DISBURSEMENT



DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEER - REQUIRE IDENTIFICATION

1 1 1 0 3 9

United States Treasury ¹⁵⁻⁵¹ 000

PAY TO THE

ORDER OF PETER POPOVICH

MONTH	DAY	YEAR
04	20	79

95350001

|| |||

FE9AW261

SYMBOL 3004

DOLLARS	CENTS
\$000032	00

P F E C
WASH DC
W9136

U.S. DEPT. OF THE TREASURY
Henry H. Eads
REGIONAL DISBURSING OFFICER

11 3004, 11 11 0000000511: 15664666611



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government Committee
314 Minnesota Boulevard
St. Paul, Minnesota 55101

Re: MURs 812 and 853

Dear Mr. Popovich:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely,

William E. Oldaker
General Counsel

Enclosure

83040-111090



Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks Who
Want Common Sense Government Committee
314 Minnesota Building
St. Paul, Minnesota 55101

83040411091
At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 9, 1979 beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on April 30, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

23040111072
(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee and its connection with any other entity, group of persons, or individuals involved in campaign related activities on behalf of Robert Short including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said entities.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this *23rd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Commons
Secretary to the Commission

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEER . . . REQUIRE IDENTIFICATION

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT



PAY TO THE

ORDER OF EILEEN M ANGELL

MONTH DAY YEAR

04 20 79

95350001

|||

WASHINGTON, D. C.

Check No. 15,664,664

SYMBOL 3004

United States Treasury

15-51
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DOLLARS	CTS.
\$664,664	00

F F E C
WASH DC
W9136

U.S. DEPT. OF THE TREASURY
Henry H. Cade
REGIONAL DISBURSING OFFICE

FE9AW261

6011407038



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Eileen M. Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

Re: MUR 818

Dear Ms. Angell:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Ms. Eileen M. Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 7, 1979 beginning at 3:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on April 30, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Democrats, Republicans, and Independents United for a Pro-Life Senate Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

8304011107

Subpoena to Angell - 2 -

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with Minnesota Citizens Concerned for Life including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with the Short for Senate Committee of Volunteers including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C. this 23rd day of April, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040411096

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER . . . REQUIRE IDENTIFICATION

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT



PAY TO THE

ORDER OF

KRISTINE KREMER

MONTH	DAY	YEAR
04	20	79

95350001

|| ||

WASHINGTON, D. C.

Check No. 15,664,663

SYMBOL 3004

United States Treasury ¹⁵⁻⁵¹/₀₀₀

POSTAL	CITY
\$0000092	00

F F E C
WASH DC
W9136

U.S. DEPT. OF THE TREASURY
Henry H. Carter
RECEIVED DISBURSING OFFICE

FE9AM261

011104038



FEDERAL ELECTION COMMISSION

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

April 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer, Chairperson
Democrats, Republicans and Independents
United for a Pro-Life Senate
515 North Labree
Thief River Falls, Minnesota 56701

Re: MUR 818

Dear Ms. Kremer:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$92. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely,

William C. Oldaker
General Counsel

Enclosure



83040411072

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Ms. Kristine Kremer, Chairperson
Democrats, Republicans and Independents
United for a Pro-Life Senate
515 North Labree
Thief River Falls, Minnesota 56701

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on May 7, 1979 beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on April 30, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Democrats, Republicans, and Independents United for a Pro-Life Senate Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

83040411009

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with Minnesota Citizens Concerned for Life including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with the Short for Senate Committee of Volunteers including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this *22nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

8304041100



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: APRIL 23, 1979
SUBJECT: 5 SUBPOENAS IN RELATION TO MURS 812, 818,
853

The attached subpoenas, approved April 23, 1979,
have been signed and sealed this date.

ATTACHMENTS:
Subpoenas (5)
Angell, Kremer, Swanson,
Tibesar, & Popovich

33040411101

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MURS 812, 818,
) and 853
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
Employees of Bob Short)
Companies Committee)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 23, 1979, the Commission approved by a vote of 6-0 the recommendation, as set forth in the General Counsel's Memorandum dated April 17, 1979, to issue subpoenas to the following individuals:

Kristine Kremer
Eileen M. Angell
Douglas V. Swanson
Peter Popovich
Leo Tibesar, Jr.

Attest:

4/22/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

33040411102

April 19, 1979

MEMORANDUM TO: MargeEmmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818, 853

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

Thank you.

8304041100



FEDERAL ELECTION COMMISSION

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

April 17, 1979

MEMORANDUM TO: The Commission

FROM: William C. Oldaker
General Counsel *W.C.O.*

SUBJECT: Subpoenas in connection with
MURs 812, 818 and 853

On April 2, 1979, the Commission approved the issuance of subpoenas to Fred L. Gates, Campaign Manager of the Short for Senate Committee of Volunteers; John Angell, Treasurer of the Democrats, Republicans and Independents United for a Pro-Life Senate Committee; Donald Wozniak, Chairman of the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee; Oscar Molomot, Chairman of the Employees of Bob Short Companies Committee; and David Osteen, a member of the Democrats, Republicans and Independents United for a Pro-Life Senate Committee.

On April 11 and 12, 1979, depositions of John Angell and Oscar Molomot were taken respectively. Based on their testimony, it appears that the Democrats, Republicans and Independents United for a Pro-Life Senate has some connection with a group called the Minnesota Citizens Concerned for Life. Additionally, their testimony indicates that the following individuals may have information relevant to our investigation of the above-referenced MURs:

Eileen M. Angell: active in the organization of the Democrats, Republicans and Independents United for a Pro-Life Senate.

Douglas V. Swanson: Assistant Treasurer of the R. E. Short Company.

Leo Tibesar, Jr.: participant in the placing of an independent advertisement in the Catholic Bulletin (no committee name).

Kristine Kremer: Chairperson, Democrats, Republicans and Independents United for a Pro-Life Senate.



Peter Popovich: Vice Chairman, Just a Bunch of Plain
DFL Folks Who Want Common Sense Government Committee.

The Office of General Counsel recommends that the Commission authorize the issuance of subpoenas to the five named individuals to facilitate the investigation of MURs 812, 818 and 853.

83040411103

AUTHORIZATION TO ISSUE A SUBPOENA TO FACILITATE THE
INVESTIGATION OF MURs 812, 818 and 853

The Commission hereby authorizes subpoenas to be issued
to the following individuals:

Kristine Kremer
Eileen M. Angell
Douglas V. Swanson
Peter Popovich
Leo Tibesar, Jr.

Joan D. Aikens, Chairman

Vernon W. Thomson, Commissioner

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

John W. McGarry, Commissioner

Max L. Friedersdorf, Commissioner

83040411106

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Ms. Kristine Kremer, Chairperson
Democrats, Republicans and Independents
United for a Pro-Life Senate
515 North Labree
Thief River Falls, Minnesota 56701

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on beginning at and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Democrats, Republicans, and Independents United for a Pro-Life Senate Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

93040411107

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with Minnesota Citizens Concerned for Life including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with the Short for Senate Committee of Volunteers including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this day of _____, 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

83040411109

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Ms. Eileen M. Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on _____ beginning at _____ and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Democrats, Republicans, and Independents United for a Pro-Life Senate Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

33040411109

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with Minnesota Citizens Concerned for Life including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with the Short for Senate Committee of Volunteers including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

330404111C

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Mr. Douglas V. Swanson, Treasurer
Robert E. Short Company
215 South 11th Street
Minneapolis, Minnesota 55403

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on _____ beginning at _____ and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Democrats, Republicans, and Independents United for a Pro-Life Senate Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with Minnesota Citizens Concerned for Life including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to Democrats, Republicans and Independents United for a Pro-Life Senate and its connection with the Short for Senate Committee of Volunteers including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committees.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

33040411112

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks Who
Want Common Sense Government Committee
314 Minnesota Building
St. Paul, Minnesota 55101

33040411113

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on _____ beginning at _____ and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

8304041114

, 1979.

ATTEST:

Secretary to the Commission

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and Other Relevant Documents

TO: Mr. Leo Tibesar, Jr.
2260 Summit Avenue
St. Paul, Minnesota 55105

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on beginning at and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain in any way whatever to your activities or other persons activities on behalf of the Senate candidacy of Robert Short.

(b) Contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with the Senate candidacy of Robert Short in any capacity whatever.

8304041111

Subpoea to Tibesar - 2 -

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set her hand at Washington, D.C., this
day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

83040111116



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Rice
2220 Vincent Avenue, North
Minneapolis, MN 55411

Re: MUR 812

Dear Mr. Rice:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

Please confirm your scheduled appearance with
Suzanne Callahan on our toll free line (800/424-9530)
within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Subpoena
Money Order



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

☆GPO 1977-0-240-555



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Rice
2220 Vincent Avenue, North
Minneapolis, MN 55411

Re: MUR 812

Dear Mr. Rice:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

*enc
5/23/79*

William C. Oldaker
General Counsel

Enclosures
Subpoena
Money Order



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. James Rice
2220 Vincent Avenue, North
Minneapolis, MN 55411

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 20, 1979, beginning at 11:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on June 18, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to Just A Bunch of Plain DFL Folks Who Want Common Sense Government Committee including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

Subpoena to James Rice

(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to the Short for Senate Committee Volunteers including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 22th day of *May*, 1979.

Robert O. Tiernan
Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

83040111122

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 66,064,134
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
ANY OF YOUR INSTRUMENTS - RETURN TO THE ISSUING OFFICE



LL L

United States Treasury ¹⁵⁻⁵¹ 000

PAY TO THE
ORDER OF JAMES RICE

MONTH	DAY	YE
05	23	79

95350001

LL L

DOLLARS	CTS.
\$*****32	00

☐ F E C
WASH DC
W9173

Henry H. Cade
GENERAL DISBURSING OFFICER

FE9AW310 WITNESS



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812

Dear Mr. Short:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Subpoena
Money Order



83040411124

Callahan MUR 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:
Bruce Short

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

(3 ways to obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
L. Kline

4. DATE OF DELIVERY *5-29* POSTMARK
 MAY 29 1977
 CLERK'S INITIALS
Long

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812

Dear Mr. Short:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

one
5/23/79
Sincerely,

William C. Oldaker
General Counsel

Enclosures
Subpoena
Money Order



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Brian Short
828 Midland Bank Bldg
401 2nd Avenue, South
Minneapolis, MN 55401

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 20, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on June 18, 1979, at the above stated location:

(a) All correspondence, memoranda, or other documents from or to you under your control which pertain to the Short for Senate Committee of Volunteers including, but not limited to, the formation, operation and dissolution of said committee, along with other contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

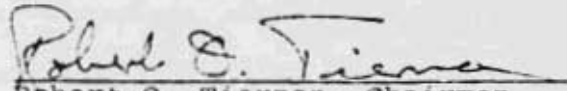
33040411126

Subpoena to Brian Short

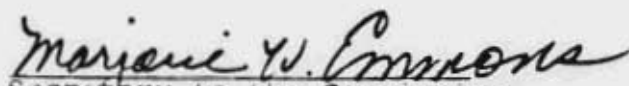
(b) All correspondence, memoranda or other documents from or to you under your control which refer in any way to the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee including, but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

(c) All correspondence, memoranda, or other documents from or to you under your control which refer in any way to the Employees of Bob Short Companies Committee including but not limited to correspondence, contemporaneous memoranda, telephone logs, daily calendars, and any other records under your control regarding phone calls to or other oral communication with persons associated with said committee.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 22th day of May, 1979.


Robert O. Tiernan, Chairman
Federal Election Commission

ATTEST:


Secretary to the Commission

33040411127

8304011128

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. **66,064,133**
SYMBOL 3004

DO NOT FOLD, SPINdle OR MUTILATE.
KNOW YOUR ENDORSEMENT



United States Treasury

PAY TO THE
ORDER OF BRIAN SHORT

MONTH DAY YEAR
05 23 79

95350001

LL L

AMOUNT	CENTS
\$000032	00

F E C
WASH DC
W9173

Henry H. Eades
FISCAL SERVICE OFFICER

FE9AW310 WITNESS



FEDERAL ELECTION COMMISSION

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

May 23, 1979

Mr. Frank Walz
Thirty-Eighth Floor
IDS Tower
80 South Eighth Street
Minneapolis, MN 55402

Re: MURs 812, 818, and 853

Dear Mr. Walz:

Enclosed are copies of deposition notifications which the Commission has sent to those individuals which have retained you as counsel pursuant to your letter of April 4, 1979.

I have been advised by my staff that you may also represent additional respondents in connection with the above-referenced matters.

Please advise this office in writing of any additional individuals you represent in order that we may send you copies of our correspondence to them.

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Six letters





FEDERAL ELECTION COMMISSION

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

Mr. Frank Walz
Thirty-Eighth Floor
IDS Tower
80 South Eighth Street
Minneapolis, MN 55402

Re: MURs 812, 818, and 853

Dear Mr. Walz:

Enclosed are copies of deposition notifications which the Commission has sent to those individuals which have retained you as counsel pursuant to your letter of April 4, 1979.

I have been advised by my staff that you may also represent additional respondents in connection with the above-referenced matters.

Please advise this office in writing of any additional individuals you represent in order that we may send you copies of our correspondence to them.

SMC
5/23/79

Sincerely,

William C. Oldaker
General Counsel

Enclosures
Four letters





FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, MN 55404

Re: MUR 812 and 818

Dear Mr. Gates:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz



83040411132

MUR 8124818

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: <i>Fred Gates</i>								
3. ARTICLE DESCRIPTION <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> (Always obtain signature of addressee or agent)			REGISTERED NO.	CERTIFIED NO.	INSURED NO.			
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent								
4. <i>K. J. Skelton</i> DATE OF DELIVERY <i>5/29/79</i>								
5. ADDRESS (Complete only if requested)								
6. UNABLE TO DELIVER BECAUSE:								
MINNEAPOLIS MAY 29 1979 REC		CLEVER INITIALS KS						



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, MN 55404

Re: MUR 812 and 818

Dear Mr. Gates:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

SMC
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz





FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Mr. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 11:00 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Mr. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 11:00 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

OK
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812 and 853

Dear Mr. Wozniak:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 10:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

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

cc - Frank Walz

3304011137

MUR 812 + 853

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:
Donald Wyzniak

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

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
MAY 2 9 1979

5. ADDRESS (Complete only if registered)
CH

6. UNABLE TO DELIVER BECAUSE
CH

POSTMARK
MAY 29 1979
MINN 55112
CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 812 and 853

Dear Mr. Wozniak:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 10:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

SMC
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Leo Tibesar, Jr.
2260 Summit Avenue
St. Paul, MN 55105

Re: MUR 812

Dear Mr. Tibesar:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 20, 1979, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

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

83040411110

MUX 817

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:
Les Tibes ar

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
P. Mc Eude

4. DATE OF DELIVERY
MAY 31 1979

5. ADDRESS: Complete only if requested

6. UNABLE TO DELIVER BECAUSE

INITIALS

☆GPO 1977-0-249-580



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Leo Tibesar, Jr.
2260 Summit Avenue
St. Paul, MN 55105

Re: MUR 812

Dear Mr. Tibesar:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 20, 1979, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

SMC
5/23/77 Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks
413 Minnesota Boulevard
St. Paul, MN 55101

Re: MUR 812 and 853

Dear Mr. Popovich:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 9:00 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

cc: Frank Walz

33040411143

MUR 8124853

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:
Peter Rogovich

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

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

4. *Kathy Thayer*
DATE OF DELIVERY
MAY 2 9 1978
POSTMARK
MAY 2 9 1978
MAY 2 9 1978

5. ADDRESS (Complete only if insured)

6. UNABLE TO DELIVER BECAUSE: _____
CLERK'S INITIALS _____



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich, Vice Chairman
Just a Bunch of Plain DFL Folks
413 Minnesota Boulevard
St. Paul, MN 55101

Re: MUR 812 and 853

Dear Mr. Popovich:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 22, 1979, beginning at 9:00 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

one
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc: Frank Walz



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Eileen Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Ms. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

A handwritten signature in cursive script, reading "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

cc: Frank Walz



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Eileen Angell
4358 Coolidge Avenue, South
St. Louis Park, MN 55424

Re: MUR 818

Dear Ms. Angell:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 23, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

SMC
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc: Frank Walz



FEDERAL ELECTION COMMISSION

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

May 23, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer
515 North Labree
Thief River Falls, MN 56701

Re: MUR 818

Dear Ms. Kremer:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz



8304011118

MUR 818

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:
Kristine Kremer

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
64

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Kristine Kremer

4. DATE OF DELIVERY *5-24-79* POSTMARK
CHIEF RIVER FALLS MAY 20 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆GPO 1977-0-248-000

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Kristine Kremer
515 North Labree
Thief River Falls, MN 56701

Re: MUR 818

Dear Ms. Kremer:

This is to advise you that in connection with the Commission's subpoena to appear for deposition dated April 2, 1979, your appearance has been rescheduled.

The deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on June 21, 1979, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

SMC
5/23/79
Sincerely,

William C. Oldaker
General Counsel

cc - Frank Walz





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *WE*
DATE: MAY 23, 1979
SUBJECT: SUBPOENAS IN RELATION TO MURS 812 and 853

The attached subpoenas, approved May 4, 1979, have been signed and sealed.

ATTACHMENTS:
Subpoenas (2)
1. B. Short
2. J. Rice

33040411130

O'CONNOR & HANNAN

ATTORNEYS AT LAW

THIRTY-EIGHTH FLOOR, IDS TOWER
80 SOUTH EIGHTH STREET

1747 PENNSYLVANIA AVE. N.W.
WASHINGTON, D.C. 20006
(202) 786-8700

(612) 341-3600

TELEX 29-0584

TELECOPIER 612 341-3600 (256)

PASEO DE LA CASTELLANA, 5
MADRID 1, SPAIN
(91) 276-5524
TELEX 22350 ORVAN E

DAVID BURLINGAME
MARTIN M. BERLINER
SUITE 860, ONE PARK CENTRAL
1515 ARAPAHOE STREET
DENVER, COLORADO 80202
(303) 573-7737

April 4, 1979

JOHN J. LYNN
H. ROBERT HALPERN
JOSEPH E. DILLON
THOMAS H. QUINN
HOWARD G. FELDMAN
DAVID R. MELINCOFF
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
LAWRENCE A. JONES
PETER C. RISSEL
CAROL N. PARK
JOSEPH E. PATRISON
CHARLES W. GARRISON
GORDON A. GAYER

RALPH F. BERLOW (1923-1972)

OF COUNSEL
JOSEPH F. CASTIELLO
FRED O. 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: MURs 818 and 812

Dear Mr. Whitehead:

Confirming our series of telephone conversations today, please be advised that our firm has been retained to represent the Short for Senate Committee of Volunteers; the Democrats, Republicans and Independents United for a Pro-Life Senate; and Messrs. Fred Gates, John Angell and David Osteen, to the extent that these individuals may have been associated with the foregoing Committees, in connection with the inquiry or investigation of the Federal Election Commission currently underway bearing the above captions.

To this moment, I have seen only the subpoena directed to Mr. Gates. As we discussed, the subpoena is totally objectionable in its present form, as going far beyond the purview of what I understand to be the inquiry initiated by your agency following its receipt of a letter complaint or complaints from opposing political groups or individuals during the 1978 campaign.

You indicated that you would give consideration to redrafting the subpoena, and I indicated in essence that if you concluded not to do so, it would be my intention to move to quash the subpoena pursuant to FEC Reg. § 111.13, or by other appropriate action.

901874

33040411151

J. O'CONNOR
ALAN W. THOMAS
WALTERS
JOA. KELLER M.
E. E. MCQUIRE
H. L. POST
J. B. JONES, JR.
J. CHRISTIANSON, JR.
H. L. S. FARRER
H. J. WALZ
H. R. DORSEY
JOHN J. SHEA
DOUGLAS M. MC MILLAN
CHARLES D. REITE
WILLIAM R. MCGRANN
WALTER C. PARKINS
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 (1918-1970)

LOUIS COUNSELY
F. JAVIER FABREGAT

Mr. Thomas J. Whitehead

Page 2

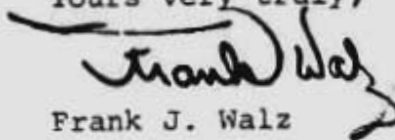
April 4, 1975

Next, I indicated that given the short notice provided in the subpoena to produce documents and appear for deposition, we would request that the dates specified for the production of documents and the taking of the depositions of Messrs. Gates and Osteen be rescheduled to a mutually convenient date. You indicated that you would attempt to accommodate us in that regard.

Finally, I understand that the deposition of Mr. Angell will proceed next week as scheduled.

I would appreciate confirmation of our understanding from you and thank you for the consideration you have shown.

Yours very truly,



Frank J. Walz

FJW:emw

83040411152



FEDERAL ELECTION COMMISSION

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

March 30, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bob Bradley
Associated Reporters
647 Midland Bank
Minneapolis, Minnesota 55401

Re: MURs 812 818, 853

Dear Mr. Bradley:

This is to confirm our telephone arrangements with your office concerning the taking of depositions at the U.S. Courthouse on April 11th at 10:00 a.m., 11:00 a.m. and 2:00 p.m., and on April 12th at 10:00 a.m. and 2:00 p.m. Also, documents which we have subpoenaed may be delivered to room 446 on April 9th.

If you have any questions concerning the arrangements, please contact Suzanne Callahan at (202) 523-4529.

Please note that 2 U.S.C. § 437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

April 11, 1979

Mr. Frank J. Walz
O'Connor & Hannan
80 South Eighth Street, 38th Floor
Minneapolis, Minnesota 55402

Dear Mr. Walz:

This office has received your letter of April 4, 1979, confirming the telephone conversations held between you and Mr. Whitehead on that date.

In response to your request for confirmation of understandings reached, please be advised that the depositions of Messrs. Gates and Osteen will be rescheduled at a mutually convenient date. We propose that these depositions be rescheduled for the week of April 23, 1979.

With regard to the subpoena specifications directed to Mr. Gates relevant to the investigations in MURs 812 and 818, the staff is not in a position to narrow these specifications but will make every effort to accommodate you in connection with the documents to be produced.

Sincerely,

William C. Oldaker
General Counsel



MS Form 3011, 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: *Short*
S. Meriane
Thn, Thn 55431

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
438268

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X New RE Short

4. DATE OF DELIVERY *8* POSTMARK
APR 18 1961
WINN-REC
USPO

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Re: MURs 318 and 812

Dear Mr. Gates:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Dear Mr. Gates:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

WCO
4/2/77

33040411157

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

83040411158

Subpoena to Gates

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

104011159

3040111150

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. **95,074,493**
SYMBOL 3000

DO NOT FOLD, SPIN, OR MUTILATE
KNOW YOUR ENDORSEMENT - REQUIRE IDENTIFICATION

LL 111 LL L



United States Treasury 15-51
000

MAR 23 1979

PAY ► ► ► ► ► ► ► ►
TO THE
ORDER OF

*****32.00*

95350001 F E C WASH DC

Henry H. Eades
DIRECTOR, DIVISION OF DISBURSEMENT



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MURs 312 and 853

Dear Mr. Wozniak:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. O'Daker
General Counsel

Enclosure



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Dear Mr., Wozniak:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

33040111153

smc
4/2/79

Subpoena to Wozniak

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

3 3 0 4 0 4 1 1 1 6 3

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

33040-11164

23040411163

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,495
SYMBOL 3000

DO NOT FOLD, SPINdle OR MUTILATE
KNOW YOUR ENDORSEMENT -- ACQUIRE IDENTIFICATION



United States Treasury 15-51
000

MAR 23 1979

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE ORDER OF DONALD WOZNAK
LL 95350001 F E C WASH DC
L L

*****32.00*

Henry H. Eide
TREASURER, U.S. DEPT. OF THE TREASURY



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

MUR 818

Dear Mr. O'Steen:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours

William C. Oldaker
General Counsel

Enclosure



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

MUR

Dear Mr. O'Steen:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

83040411167

Smel
4/2/77

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 11:00 and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to O'Steen

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

04041169

0140111170

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,497
SYMBOL 3000

MAR 23 1979

United States Treasury 15-51
000

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE
ORDER OF LL DAVID OSTEEN
LL 95350001 F E C WASH DC
L L

*****32.00*



DO NOT FOLD, SPINCLE OR MUTILATE.
KNOW YOUR ENDORSE - - ACQUIRE IDENTIFICATION

Henry H. ...
TREASURER OF THE UNITED STATES



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

MUR 812

Dear Mr. Molomot:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



33040111172

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,496
SYMBOL 3000

DO NOT FOLD, SPIN, OR MUTILATE
KNOW YOUR EMPLOYER'S REQUIREMENTS



United States Treasury 15-51
000

MAR 23 1979

PAY ►►►►►►►►
TO THE
ORDER OF OSCAR MOLOMOT
95350001 F E C WASH DC

\$ * * * * 32.00 *

Handwritten signature
MAR 23 1979



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

Re: MUR 318

Dear Mr. Angell:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



3304011117:
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

MUR

Dear Mr. Molomot::

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours, *W.C. Oldaker* 4/2/79

William C. Oldaker
General Counsel

Enclosure

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to Molomot

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmens
Secretary to the Commission

3 3 0 4 0 1 1 1 7 6

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

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in connection with the Senate campaign of Robert Short.

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the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

SMC
4/2/79

33040-111177

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

- 2 -

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

Margaret W. Emerson
Secretary to the Commission

3 0 4 0 4 1 1 1 3 0

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,494
SYMBOL 3000

MAR 23 1979

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEMENT - REQUIRE IDENTIFICATION



United States Treasury 15-51
000

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE
ORDER OF JOHN ANGELL
LL L

*****32.00*

L 95350001 F E C WASH DC

Henry H. Eades
TREASURER OF THE UNITED STATES

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 812, 818, 853
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
Employees of Bob Short)
Companies Committee)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 30, 1979, the Commission approved by a vote of 6-0 the recommendation, as set forth in the General Counsel's Memorandum dated March 28, 1979, that the subpoenas, attached to the memorandum, be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wosniak
Oscar Molomot
David O'Steen

Attest:

3/30/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 3-28-79, 11:42
Circulated on 48 hour vote basis: 3-28-79, 3:15

33040411131



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: APRIL 2, 1979
SUBJECT: SUBPOENAS IN RELATION TO MURs 812, 818, and
853

The attached subpoenas, approved March 30, 1979,
have been signed and sealed this date.

ATTACHMENTS:

5 Subpeonas:
Fred Gates
John Angell
Oscar Molomot
David O'Steen
Donald Wozniak

3304041113

March 28, 1979

MEMORANDUM TO: Magge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818 and 853

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

Thank you.

3304041113



FEDERAL ELECTION COMMISSION

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

9 MAR 28 All: 42

March 28, 1979

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Subpoenas for deposition in connection with
MURs 812, 818, and 853

2304041113

The facts of these cases center on allegations that 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 the Act and that the Democrats, Republicans, and Independents United for a Pro Life Senate Committee was not registered in a timely fashion with the Commission and failed to place appropriate disclaimers on its advertisements.

The Office of General Counsel recommends that the attached subpoenas be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

AUTHORIZATION TO ISSUE A SUBPOENA TO FACILITATE THE INVESTIGATION
OF MURs 812, 818 AND 853

The Commission hereby authorizes subpoenas to be issued
to the following individuals:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

Joan D. Aikens, Chairman

Vernon W. Thomson, Commissioner

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

John W. McGarry, Commissioner

Max L. Friedersdorf, Commissioner

33040411133

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

8304041113

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

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- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

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(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

33040411120

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

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- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 11:00 and continuing each day thereafter as necessary.

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- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this day of , 1979.

Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Re: MURs 319 and 312

Dear Mr. Gates:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

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8304011197

Subpoena to Gates

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

L



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Dear Mr. Wozniak:

Re: MURs 312 and 853

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
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If you have any questions, direct them to Suzanne
Callahan at (202) 523-4529.

Sincerely yours

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

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33040411201

Subpoena to Wozniak

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

183040411202

23040411200

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,495
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENEMY - ACQUIRE IDENTIFICATION



United States Treasury 15-51
000

MAR 23 1979

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE DONALD WOZNIAK
ORDER OF
LL 95350001 F E C WASH DC
L L

\$ * * * * 32.00 *

Handwritten signature



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

MUR 818

Dear Mr. O'Steen:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
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office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

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Subpoena to O'Steen - 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

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

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TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. **95,074,497**
SYMBOL 3000

DO NOT FOLD, SPINdle OR MUTILATE.
KNOW YOUR ENDORSEMENT - KNOW YOUR IDENTIFICATION



United States Treasury ¹⁵⁻⁵¹/₀₀₀

MAR 23 1979

PAY ►►►►►►►►
TO THE
ORDER OF DAVID OSTEEN
LL 95350001 F E C WASH DC

\$*****32.00*

James H. Baker
TREASURY DEPARTMENT



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

MUR 812

Dear Mr. Molomot:

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Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



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Subpoena to Molomot

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmens
Secretary to the Commission

12 11 10 9 8 7 6 5 4 3 2 1 0

83040411211

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,496
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOU'VE ENDORSED - REQUIRE IDENTIFICATION



United States Treasury 15-51
000

MAR 20 1979

PAY ►►►►►►►► \$ * * * * 3 2 . 0 0 *
TO THE
ORDER OF OSCAR MOLOMOT
95350001 F E C WASH DC

Harold H. Baker
TREASURER, U.S. DEPT. OF TREASURY



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

Re: MUR 318

Dear Mr. Angell:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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Sincerely yours,

William C. Oidaker
General Counsel

Enclosure



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to Produce Books, Records and Other Relevant Documents

TO: Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to Angell

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emerson
Secretary to the Commission

104-10404-11214

3 3 0 4 0 1 1 1 2 1 5

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,494
SYMBOL 3000

MAR 23 1979

United States Treasury 15-51
000



PAY ► ► ► ► ► ► ► ►
TO THE
ORDER OF JOHN ANGELL
LL L

*****32.00*

95350001 F E C WASH DC

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEMENT... BEFORE DEPOSITING

Handwritten signature

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 812, 818, 853
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
Employees of Bob Short)
Companies Committee)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 30, 1979, the Commission approved by a vote of 6-0 the recommendation, as set forth in the General Counsel's Memorandum dated March 28, 1979, that the subpoenas, attached to the memorandum, be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wosniak
Oscar Molomot
David O'Steen

Attest:

3/30/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 3-28-79, 11:42
Circulated on 48 hour vote basis: 3-28-79, 3:15

33040411216



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: APRIL 2, 1979
SUBJECT: SUBPOENAS IN RELATION TO MURs 812, 818, and
853

The attached subpoenas, approved March 30, 1979,
have been signed and sealed this date.

ATTACHMENTS:

5 Subpeonas:
Fred Gates
John Angell
Oscar Molomot
David O'Steen
Donald Wozniak

3 3 3 4 0 4 1 1 2 1 7

March 28, 1979

MEMORANDUM TO: Magge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818 and 853

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

Thank you.

03040411218



FEDERAL ELECTION COMMISSION

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

9 MAR 28 All: 42

March 28, 1979

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Subpoenas for deposition in connection with
MURs 812, 818, and 853

The facts of these cases center on allegations that 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 the Act and that the Democrats, Republicans, and Independents United for a Pro Life Senate Committee was not registered in a timely fashion with the Commission and failed to place appropriate disclaimers on its advertisements.

The Office of General Counsel recommends that the attached subpoenas be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

83040411215

AUTHORIZATION TO ISSUE A SUBPOENA TO FACILITATE THE INVESTIGATION
OF MURs 812, 818 AND 853

The Commission hereby authorizes subpoenas to be issued
to the following individuals:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

Joan D. Aikens, Chairman

Vernon W. Thomson, Commissioner

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

John W. McGarry, Commissioner

Max L. Friedersdorf, Commissioner

83040411220



FEDERAL ELECTION COMMISSION

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

April 11, 1979

Mr. Frank J. Walz
O'Connor & Hannan
80 South Eighth Street, 38th Floor
Minneapolis, Minnesota 55402

Dear Mr. Walz:

This office has received your letter of April 4, 1979, confirming the telephone conversations held between you and Mr. Whitehead on that date.

In response to your request for confirmation of understandings reached, please be advised that the depositions of Messrs. Gates and Osteen will be rescheduled at a mutually convenient date. We propose that these depositions be rescheduled for the week of April 23, 1979.

With regard to the subpoena specifications directed to Mr. Gates relevant to the investigations in MURs 812 and 818, the staff is not in a position to narrow these specifications but will make every effort to accommodate you in connection with the documents to be produced.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

TO:

DATE:

FROM:

- | | | |
|---|---|---|
| ☐ APPROVAL | ☐ IMMEDIATE ACTION | ☐ RECOMMENDATION |
| ☐ AS REQUESTED | ☐ INITIALS | ☐ SEE ME |
| ☐ CONCURRENCE | ☐ NECESSARY ACTION | ☐ SIGNATURE |
| ☐ CORRECTION | ☐ NOTE AND RETURN | ☐ YOUR COMMENT |
| ☐ FILING | ☐ PER OUR CONVERSATION | ☐ YOUR INFORMATION |
| ☐ FULL REPORT | ☐ PER TELEPHONE CONVERSATION | ☐ |
| ☐ HANDLE DIRECT | | |
| ☐ ANSWER OR ACKNOWLEDGE ON OR BEFORE _____ | | |
| ☐ PREPARE REPLY FOR THE SIGNATURE OF _____ | | |

REMARKS:

Letters sent
Federal Express
4-2-79
ETJ



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

Re: MURs 818 and 812

Dear Mr. Gates:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Fred L. Gates
1014 Third Avenue, South
Minneapolis, Minnesota 55404

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

83040411224

Subpoena to Gates

- 2 -

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

1040411223

83040411226

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,493
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENGINEER -- REQUIRE IDENTIFICATION



United States Treasury ¹⁵⁻⁵¹/₀₀₀

MAR 23 1979

PAY ▶▶▶▶▶▶▶▶▶▶
TO THE
ORDER OF FRED L GATES

*****32.00*

95350001 F E C WASH DC

Handwritten signature
MAR 23 1979



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MURs 812 and 853

Dear Mr. Wozniak:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Donald Wozniak
401 Midwest Federal Building
St. Paul, Minnesota 55101

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

83040411228

Subpoena to Wozniak

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

83040411229

83040111250

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,495
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDS - ACQUIRE IDENTIFICATION



United States Treasury 15-51
000

MAR 23 1979

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE DONALD WOZNIAK
ORDER OF
LL 95350001 F E C WASH DC
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\$ * * * * 3 2 . 0 0 *

Henry H. Baker
TREASURER OF THE UNITED STATES



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

MUR 818

Dear Mr. O'Steen:

Enclosed is a subpoena to appear for deposition
in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned
by the Commission shall be paid \$30.00, plus mileage at
the rate of .10 cents per mile. Enclosed is a money
order made payable to you in the amount of \$32. If
the estimated mileage is incorrect, please advise this
office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. David O'Steen
3412 Lincoln Street, N.E.
Minneapolis, Minnesota 55418

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 11:00 and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to O'Steen

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmons
Secretary to the Commission

11 22 44 33 040411233

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TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,497
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSEMENT -- REQUIRE IDENTIFICATION



United States Treasury 15-51
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MAR 23 1979

PAY ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶ ▶
TO THE
ORDER OF LL DAVID OSTEEN
LL 95350001 F E C WASH DC
L L

\$ * * * * 3 2 0 0 *

James H. Baker
TREASURER



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

MUR 812

Dear Mr. Molomot:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. Oscar Molomot
2950 Dean Parkway
Minneapolis, Minnesota 55416

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 445 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 12, 1979, beginning at 2:00 p.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to Molomot

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emmens
Secretary to the Commission

33040411237

83040411238

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,496
SYMBOL 3000

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR EMPLOYER - REQUIRE IDENTIFICATION



United States Treasury ¹⁵⁻⁵¹/₀₀₀

MAR 23 1979

PAY ► ► ► ► ► ► ► ►
TO THE
ORDER OF OSCAR MOLOMOT
95350001 F E C WASH DC

\$ * * * * 32.00 *

Handwritten signature



FEDERAL ELECTION COMMISSION

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

April 2, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

Re: MUR 318

Dear Mr. Angell:

Enclosed is a subpoena to appear for deposition in connection with the Senate campaign of Robert Short.

Pursuant to 11 C.F.R. 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of .10 cents per mile. Enclosed is a money order made payable to you in the amount of \$32. If the estimated mileage is incorrect, please advise this office.

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

Sincerely yours,

William C. Oidaker
General Counsel

Enclosure



Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and Other Relevant Documents

TO: Mr. John Angell
4358 Coolidge Avenue, South
St. Louis Park, Minnesota 55424

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Robert Short. Notice is hereby given that the deposition is to be taken at the office of Associated Reporters, 446 U.S. Courthouse, 4th Street and South 2nd Avenue, Minneapolis, on April 11, 1979, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce, on April 9, 1979, at the above stated location:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to Campaign related activities on behalf of Robert Short.

(b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Robert Short.

Subpoena to Angell

- 2 -

WHEREAS, the Chairman of the Federal Election
Commission has hereunto set her hand at Washington, D.C.,
this *2nd* day of *April*, 1979.

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Margaret W. Emerson
Secretary to the Commission

313040411211

33340111243

TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT

WASHINGTON, D. C.

Check No. 95,074,494
SYMBOL 3000

DO NOT FOLD, SPINCLE OR MUTILATE
KNOW YOUR INSTRUMENT -- MAINTAIN ITS INTEGRITY



United States Treasury ¹⁵⁻⁵¹/₀₀₀

MAR 23 1979

PAY ► ► ► ► ► ► ► ►
TO THE
ORDER OF JOHN ANGELL
LL L

* * * * * 32.00 *

95350001 F E C WASH DC

[Handwritten signature]

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 812, 818, 853
Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)
Employees of Bob Short)
Companies Committee)
Democrats, Republicans, and)
Independents United for a)
Pro-Life Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 30, 1979, the Commission approved by a vote of 6-0 the recommendation, as set forth in the General Counsel's Memorandum dated March 28, 1979, that the subpoenas, attached to the memorandum, be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wosniak
Oscar Molomot
David O'Steen

Attest:

3/30/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 3-28-79, 11:42
Circulated on 48 hour vote basis: 3-28-79, 3:15



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: APRIL 2, 1979
SUBJECT: SUBPOENAS IN RELATION TO MURs 812, 818, and 853

The attached subpoenas, approved March 30, 1979, have been signed and sealed this date.

ATTACHMENTS:

5 Subpeonas:
Fred Gates
John Angell
Oscar Molomot
David O'Steen
Donald Wozniak

March 28, 1979

MEMORANDUM TO: Magge Emmons
FROM: Elissa T. Garr
SUBJECT: MURs 812, 818 and 853

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

Thank you.

83040411213



FEDERAL ELECTION COMMISSION

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

9 MAR 28 All: 42

March 28, 1979

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Subpoenas for deposition in connection with
MURs 812, 818, and 853

The facts of these cases center on allegations that 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 the Act and that the Democrats, Republicans, and Independents United for a Pro Life Senate Committee was not registered in a timely fashion with the Commission and failed to place appropriate disclaimers on its advertisements.

The Office of General Counsel recommends that the attached subpoenas be issued to the following individuals who have information which will facilitate the investigation of the above referenced MURs:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

AUTHORIZATION TO ISSUE A SUBPOENA TO FACILITATE THE INVESTIGATION
OF MURs 812, 818 AND 853

The Commission hereby authorizes subpoenas to be issued
to the following individuals:

Fred L. Gates
John Angell
Donald Wozniak
Oscar Molomot
David O'Steen

Joan D. Aikens, Chairman

Vernon W. Thomson, Commissioner

Robert O. Tiernan, Vice Chairman

Thomas E. Harris, Commissioner

John W. McGarry, Commissioner

Max L. Friedersdorf, Commissioner

93040411247



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *mwe*

DATE:

MARCH 13, 1979

SUBJECT:

MUR 853 - Interim Investigatory Report dated
3-7-79: Signed in OGC 3-8-79;
Received in OCS 3-9-79, 2:36

The above-named document was circulated on a 24
hour no-objection basis at 4:30, Monday, March 12, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as of
4:30 this date.

8304011218

March 9, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 853

Please have the attached Interim Invest Report
on MUR 853 distributed to the Commission.

Thank you.

33040411215

BEFORE THE FEDERAL ELECTION COMMISSION
March 7, 1979

FILED
OFFICE OF THE
CLERK
MAR 9 P 2: 36

In the Matter of)

The Just a Bunch of Plain DFL)
Folks Who Want Common)
Sense Government Committee)

MUR 853

Interim Investigatory Report

The Commission has found 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, §434 and 11 CFR 109.2(c).

In light of the fact that the respondent in this case is also a respondent in MUR 812, we plan to take depositions in connection with both matters simultaneously. As soon as all the responses are received in connection with MUR 812, a request for subpoenas for deposition will be circulated to the Commission for approval.

Date: 8 March 1979


William C. Oldaker
General Counsel

83040411250



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS

DATE:

FEBRUARY 15, 1979

SUBJECT:

MUR 853 - Interim Investigatory Report
dated 2-7-79: Signed by GC 2-13-79;
Received in OCS 2-14-79, 10:20

The above-named document was circulated on a 24
hour no-objection basis at 4:30, February 14, 1979.

The Commission Secretary's Office has received
no objections to the Interim Investigatory Report as of
4:30 this date.

MWE

33040411251

February 14, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 853

Please have the attached Interim Invest Report
on MUR 853 distributed to the Commission.

Thank you.

83040411252

BEFORE THE FEDERAL ELECTION COMMISSION
February 7, 1979

RECEIVED
OFFICE OF THE
CLERK OF THE
U.S. HOUSE OF REPRESENTATIVES

In the Matter of)

79 FEB 14 A10: 20

MUR 853

The Just a Bunch of Plain DFL)
Folks Who Want Common Sense)
Government Committee)

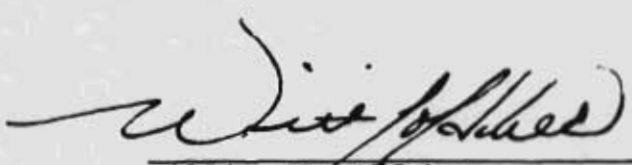
Interim Investigatory Report

The Commission has found 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, §434 and 11 CFR 109.2(c).

We are currently preparing to take depositions in connection with this matter and will make a final recommendation to the Commission as soon as possible.

83040411253
Date

2/13/79


William C. Oldaker
General Counsel



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.

8304041123



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 853 - Interim Investigative Report
dated 1-10-79; Signed 1-12-79;
Received in OCS Friday, 1-12-79,
3:21

The above-named document was circulated on a 24
hour no-objection basis at 3:30, Monday, January 15, 1979.

The Commission Secretary's Office has received
no objections to the Interim investigative Report as of
4:00 this date.

8304041123

January 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 853

Please have the attached Interim Invest Report on
MUR 853 distributed to the Commission.

Thank you.

8304041123

BEFORE THE FEDERAL ELECTION COMMISSION
January 10, 1979

RECEIVED
OFFICE OF THE
SECRETARY

79 JAN 12 P 3: 21

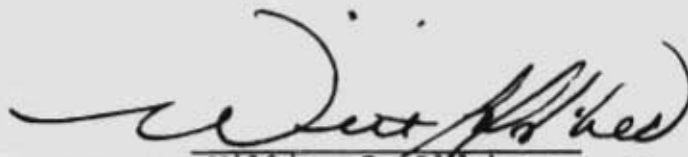
In the Matter of)
)
Just a Bunch of Plain) MUR 853
DFL Folks Who Want Common)
Sense Government Committee)

INTERIM INVESTIGATIVE REPORT

On December 20, 1978, the Commission found 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, 434, and 11 C.F.R. 109.2(c).

The Committee's response is currently being reviewed; a recommendation will be made to the Commission shortly.

1/12/79
Date


William C. Oldaker
General Counsel

83040-11257

LAW OFFICE

Peterson, Popovich, Knutson & Flynn

PROFESSIONAL ASSOCIATION
314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101
612-222-5515

RECEIVED
FEDERAL ELECTION
COMMISSION

FRED N. PETERSON, JR.
PETER S. POPOVICH
JAMES E. KNUTSON
JOSEPH E. FLYNN
PAUL W. HETLAND
ROBERT A. HUGHES
PAUL C. RATWIK
THOMAS V. BENDER
JOHN M. ROSZAK
THOMAS M. SIPKINS
THOMAS S. DEANS
PATRICIA A. MALONEY

PETERSON & POPOVICH
1947.

September 5, 1979 ⁷⁹SEP 7 PM 12:07

Mr. Robert W. Riley
647 Midland Bank Building
Minneapolis, MN 55401

Dear Mr. Riley:

Enclosed you will find our check in the amount of \$30.80 to cover the cost of the transcript taken July 20, 1979, in connection with the Federal Election Commission.

My recollection was that I did not waive the reading and the signing of the deposition. In fact, it has always been my practice to review a deposition. Your certificate is to the contrary. There are a number of typographical and other changes. Would you kindly send me the appropriate document so that I can list the pages and the changes that should be made as there was no page in the copy of the transcript that I received that permitted this.

Sincerely yours,

Peter S. Popovich

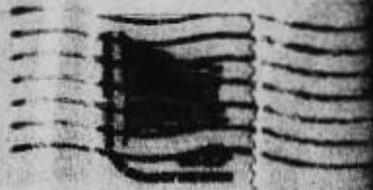
PSP:ds
Enclosure

cc: ✓ Mr. Thomas J. Whitehead

33040411253

8304041129
Peterson, Popovich, Knutson & Flynn, P.A.

214 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101



79 SEP 7 PM 12:07

RECEIVED
FEDERAL ELECTION
COMMISSION

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

Q004
10040

LAW OFFICE
Peterson, Popovich, Knutson & Flynn

PROFESSIONAL ASSOCIATION
314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101
612-222-5515

PETERSON & POPOVICH
1947 -

RED N. PETERSON, JR.
PETER S. POPOVICH
JAMES E. KNUTSON
JOSEPH E. FLYNN
PAUL W. HETLAND
ROBERT A. HUGHES
PAUL C. RATWIK
THOMAS V. BENDER
JOHN M. ROSZAK
THOMAS M. SIPKINS
THOMAS S. DEANS
PATRICIA A. MALONEY

May 1, 1979

902243

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

Re: MUR 853

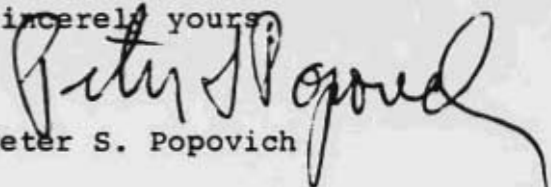
Dear Mr. Oldaker:

Replying to your letter of March 30, 1979, please be advised, in answer to your questions, as follows:

1. I was merely one of the co-hosts of the fund raiser.
2. The Short Volunteer Committee organized it.
3. Unknown.
4. Orally and by mail.
5. Unknown.
6. Yes.
7. Unknown to me, but check with the treasurer.
8. None available.

The above answers are based on my knowledge now, several months after the event. My understanding is that the treasurer made the appropriate reports. I personally was not involved in the bookkeeping-accounting responsibilities.

Sincerely yours


Peter S. Popovich

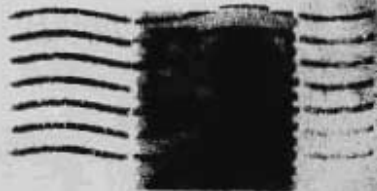
PSP:ds

33040111263

83040411261

Peterson, Popovich, Knutson & Flynn, P.A.

314 MINNESOTA BUILDING
SAINT PAUL, MINNESOTA 55101



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

83040411252

853 CALLAHAN

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
PETER POPOVICH

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 913144

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
Paul C. Kellum

4. DATE OF DELIVERY
APR 3 1979

5. ADDRESS: Complete only if requested.
314 Minnesota St. 55403

6. UNABLE TO DELIVER BECAUSE

POSTMARK
 PAUL
 ST. CLERK
 INCHES



FEDERAL ELECTION COMMISSION

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

March 30, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Popovich
314 Minnesota Building
St. Paul, MN 55101

Re: MUR 853

Dear Mr. Popovich:

In furtherance of its investigation into the above referenced matter, the Commission requests that you supply written answers to the enclosed questions within five days of your receipt of this notification.

Please note that 2 U.S.C. §437g(a)(3)(B) 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.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the word "Sincerely,".

William C. Oldaker
General Counsel

Enclosure
Questions
News Article

83040411265

QUESTIONS

1. Please state your involvement with the fundraiser held on October 25, 1978, at the Town and Country Club in St. Paul to which the enclosed article refers.
2. Who organized the fundraiser?
3. When were plans first made for the fundraiser?
4. In what manner were the funds solicited and collected for the fundraiser?
5. What funds were used for expenses for the fundraiser (i.e. food, drinks, restaurant deposit etc.)?
6. Were tickets sold for the fundraiser? If so, please submit a copy of the ticket or a statement as to the wording which appeared on the face of the tickets.
7. On what date, in what manner, and in what name were the proceeds from the fundraiser transferred to the Short Committee?
8. Please submit to the Commission, all correspondence, memoranda or other relevant documents from or to you, under your control, in connection with your fundraising activities on behalf of the Senate candidacy of Robert Short.

040411264

Fund-raiser long on cash for Short

By GARY DAWSON
Staff Writer

DFL U.S. Senate candidate Bob Short received a badly needed financial shot in the arm Wednesday night when a group of his self-proclaimed "common sense" Democrats raised more than \$40,000 at a \$100-a-head fund-raiser at the Town and Country Club in St. Paul.

St. Paul attorney Peter Popovich, one sponsor, estimated organizers sold a minimum of 410 tickets and should have at least \$41,000 additional money to pump into media advertising during the last two weeks of Short's campaign against Independent-Republican Dave Durenberger.

About 200 persons showed up including state DFL party chairman Rick Scott, who wore a "Short" campaign sticker.

When asked if his appearance and wearing of the sticker ran counter to his party's executive committee refusal to support Short, Scott said he didn't think so.

Among those attending were political independents, labor leaders, a smattering of Republicans, and a large number of DFLers who have been associated with Short for several years or who supported him in his successful DFL primary campaign against party-endorsed Don Fraser.

Short has spent more than \$1 million in the campaign thus far. But most of that was in the primary campaign that ended with his Sept. 12 victory. His campaign coffers, he said, have been strained because of the inflationary cost of doing political business these days.

"If I wasn't prepared to put my money where my mouth is, I shouldn't open it... but you can't believe what these newspapers charge for a little ad," he told supporters as he thanked them for their generosity.

Attorney General Warren Spannaus and a handful of state legislators also were on hand.

2 are convicted
of bank robbery

The fund-raiser came at a time when Durenberger is putting on his own push for victory — equalling Short's television buying in the Twin Cities and exceeding it in one large outstate area served by Alexandria.

Short promised if elected to wipe out "fraud, waste and mismanagement" in federal government — a pledge that sets well with his many business backers.

He also made reference to his detractors within the DFL party, many of whom supported Fraser but refused to come into his camp when he won the primary.

"Some of those people got their nose slightly out of joint because they don't know how I got 257,000 votes," Short said.

The Minneapolis Star and Tribune, which have opposed him editorially, also came in for criticism from the candidate.

"I did win in the areas where they don't deliver the Minneapolis Tribune and Minneapolis Star, so if you don't read these papers for the next two weeks, we'll be all right," Short said.

After his speech Short had more words for the Star which editorially endorsed Durenberger on the front page.

"I'm glad to see them admit that the front page is their opinion page," he quipped.

Short called the event the "most significant" fund-raiser in a campaign that has been financed almost solely out of his own pocket.

Earlier in the day, speaking before a group of realtors at the Lost Spur Country Club, he reiterated his view that inflation is the most serious threat to the nation.

Also Wednesday, Short outlined a five-point plan to enforce spending cuts, including tougher anti-fraud laws and blue ribbon investigating committees to oversee federal spending.

Meanwhile, the 5th Congressional District DFL in Minneapolis, which met Tuesday night, reaffirmed its anti-Short stance by passing a resolution urging the defeat of Short.

2 businesses



what they called a junkyard in bygone days
just waiting for someone who needs
it. Photo by Spence Hollstadt

loud killings

A patient, interminable night to 12 at the The main to Grafft as to give a public

only that ver in the not while he observed the lessening long pen-man feet, Mr. mind empties

drawing them. Police have theorized the murderer was someone they knew.

Asked by Grafft what the suspect's motive would have been for the murders, Mr. X replied, "He was schizo and nuts."

Mr. X said he became suspicious of the man after learning the suspect killed himself shortly after the Rokers were murdered.

Investigators for the sheriff's office have refused to comment on the case. The St. Cloud Times, however, found out that a patient matching the description given by Mr. X did kill himself eleven days after the Rokers were murdered.

The man, a 54-year-old St. Cloud

St Paul Pioneer Press

10-26-78 P28



FEDERAL ELECTION COMMISSION

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

March 30, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Bob Bradley
Associated Reporters
647 Midland Bank
Minneapolis, Minnesota 55401

Re: MURs 812, 818, (853)

Dear Mr. Bradley:

This is to confirm our telephone arrangements with your office concerning the taking of depositions at the U.S. Courthouse on April 11th at 10:00 a.m., 11:00 a.m. and 2:00 p.m., and on April 12th at 10:00 a.m. and 2:00 p.m. Also, documents which we have subpoenaed may be delivered to room 446 on April 9th.

If you have any questions concerning the arrangements, please contact Suzanne Callahan at (202) 523-4529.

Please note that 2 U.S.C. § 437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission.

Sincerely,

William C. Oldaker
General Counsel



December 27, 1978

Ms. Suzanne Callahan
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

RE: MUR 853 (78)

Dear Ms. Callahan:

33040411267
In response to the question posed in the second paragraph of your letter of December 21, 1978, I did attend the fundraiser at the Town and County Club. I did not sponsor it. One of the sponsors of that event was Peter Popovich, a Vice Chairman of this Committee. Although the proceeds of that fundraiser went to Short's principal Campaign Committee, Mr. Popovich had no control over the manner in which the funds were spent.

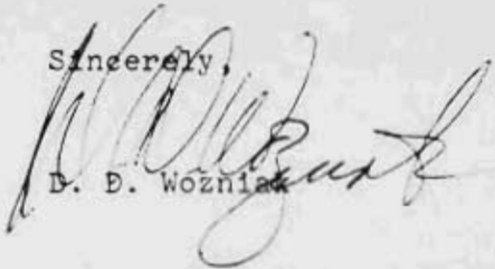
It is without question that most, if not all, of the people who participated in the Plain Folks Committee were old friends of Short. We wanted to see that he was elected to the U.S. Senate because all of us believed that he would make a valuable contribution.

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.

We deny all of the alleged violations raised in Mr. Crosby's letter of November 13, 1978. A Statement of Organization was filed within ten days as required by law. We did notify the FEC by telegraph about expenditures in excess of \$1,000.00. We telephoned the Commission to ask if we had to report \$1,000.00 contributions within 24 hours. We were told this was not necessary.

The information supplied in summary fashion in the letter can be supplied under oath if you believe necessary. Thank you for your consideration.

Sincerely,


D. D. Wozniak

LAW OFFICES
AK
101 MIDWEST FEDERAL BUILDING
PAUL, MINNESOTA 55101

LAW OFFICES
D. D. WOZNAK
101 MIDWEST FEDERAL BUILDING
ST. PAUL, MINNESOTA 55101

304011123

Ms. Suzanne Callahan
Federal Election
Commission
1325 K Street NW
Washington, D.C. 20463

FIRST CLASS MAIL

FIRST CLASS MAIL

73 J 61



FEDERAL ELECTION COMMISSION

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

December 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
Committee
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 853 (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 853 (78). A copy of the complaint is enclosed. On December 20, 1978, the Commission found reason to believe that the matters alleged therein state violations of 2 U.S.C. §433, §434, and 11 CFR 109.2(c). On that same date, the Commission determined that there is no reason to believe the committee has violated 11 CFR 104.4(e).

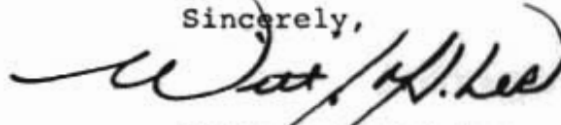
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In your response, please state whether you or the Just a Bunch Committee sponsored, or were in any way connected with the fundraiser held on October 25, 1978, at the Town and Country Club in St. Paul to which the enclosed article refers.

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 at 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

Enclosure

Complaint

8304041127

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: *Wagner*
401 Thielweg Rd NE
St Paul, MN 55101

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943440

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY
DEC 26 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

POSTMARK
ST. PAUL, MN
DEC 26
8 00 PM

★GPO: 1977-0-248-080



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
Committee
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 853 (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 853 (78). A copy of the complaint is enclosed. On December , 1978, the Commission found reason to believe that the matters alleged therein state violations of 2 U.S.C. §433, §434, and 11 CFR 109.2(c). On that same date, the Commission determined that there is no reason to believe the committee has violated 11 CFR 104.4(e).

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 state whether you or the Just a Bunch Committee sponsored, or were in any way connected with the fundraiser held on October 25, 1978, at the Town and Country Club in St. Paul to which the enclosed article refers.

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 at 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.

smc
12/19/48

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Complaint

83040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 853 (78)
Just a Bunch of Plain DFL Folks Who)
Want Common Sense Government Committee)

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. §§433, 434, and 11 CFR 109.2(c).
2. Find no reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee has violated 11 CFR 104.4(e).
3. Send the notification letter to the respondent which is 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 a 48 hour vote basis: 12-18-78, 3:00

83040111273

December 18, 1978

MEMORANDUM TO: Marge Emmons
FROM: ElissaTT. Garr
SUBJECT: MUR 853

Please have the attached First General Counsel's
Report on MUR 853 distributed to the Commission on a
48 hour tally basis.

Thankyou.

33040411271

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER

FIRST GENERAL COUNSEL'S REPORT

78 DEC 18 PM: 15

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION DEC 18 1978

MUR NO. 853 (78)
DATE COMPLAINT RECEIVED
BY OGC 11/16/78
STAFF
MEMBER Callahan

SOURCE: Ned Crosby, Chairman
Minnesotans for Honesty in Politics

RESPONDENT'S NAME: Just a Bunch of Plain DFL Folks Who Want Common
Sense Government Committee

RELEVANT STATUTE: 2 U.S.C. §433, §434, 11 CFR 109.2(c), and 11 CFR 104.4(e)

INTERNAL REPORTS CHECKED: Just a Bunch of Plain DFL Folks Who Want Common
Sense Government Committee
Minnesotans for Honesty in Politics

FEDERAL AGENCIES CHECKED: None

BACKGROUND

The complainant, Ned Crosby, Chairman of Minnesotans for Honesty in Politics, an independent expenditure committee acting on behalf of senate candidate Durenberger, alleges that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee ("the Committee") has committed the following violations: 1/

1. The Committee did not register with the Commission in a timely fashion in violation of 2 U.S.C. §433.
2. The Committee made expenditures in excess of \$1,000 after the 15th day but more than 24 hours prior to the general election but did not report those expenditures in violation of 2 U.S.C. §434 (11 CFR 109.2(c)).
3. The Committee received contributions of \$1,000 or more after the 15th day but more than 48 hours prior to the general election but did not report them in violation of 2 U.S.C. §434 (11 CFR 104.4(e)).

1/ The Committee is registered as a multicandidate independent expenditure committee acting on behalf of Robert Short and Wendell Anderson. Allegations #1 and #2 are also addressed in MUR 812 (78)

ANALYSIS

According to the complainant, the Committee chairman, Donald Wozniak, stated in a radio interview that the Committee was formed on October 26, 1978. The complainant states that the Minneapolis Tribune advertising office received at least \$2700 from the Committee for an advertising deposit on that same day and thus, was probably formed prior to that date.

The Committee registered with the Commission on November 2nd, eight days after it allegedly deposited funds with the Tribune for advertising purposes. It appears that the Committee may have received in excess of \$1,000 in contributions prior to the 26th thereby placing the committee in violation of 2 U.S.C. §433.

The complainant further alleges that the Committee violated 11 CFR 109.2(c) for failure to report expenditures in excess of \$1,000 prior to the general election. On October 28th and November 2nd, the Committee reported, via telegram, expending \$6,193.01 and \$14,195.00 respectively. The Committee did not report on behalf of which candidate(s) the expenditures were made in violation of 2 U.S.C. §434 and 11 CFR 109.2(c).

The complainant also alleges that it is "likely" the Committee received contributions of \$1,000 or more prior to the election but did not report receipt of those funds in violation of 11 CFR 104.4(e). The above stated allegation is premised on the fact that the Committee is an authorized committee of Short. The issue of whether this group is an independent expenditure committee is addressed in MUR 812 (78). However, the Just a Bunch Committee has not been authorized by candidate Short and therefore has not violated 11 CFR 104.4(e) which pertains only to authorized committees.

The complainant submitted a newspaper article with his complaint which states that a fundraiser was held for Short by a group calling themselves "common sense" democrats which raised \$40,000 for Short's campaign. It is not clear if this group is the same as the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee (emphasis added).

It is recommended that the Just a Bunch Committee be sent questions concerning the October 25th fundraiser in order to ascertain the reporting requirements in connection with it.

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. §§ 433, 434 and 11 CFR 109.2(c).
2. Find no reason to believe that the Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee has violated 11 CFR 104.4(e).
3. Send the attached notification to the respondent.

ATTACHMENTS

Complaint
Notification letter

November 13, 1978

Federal Elections Commission
1325 K Street, Northwest
Washington, D.C. 20463

NOV 15 AM 8:56
807829

Dear Sirs:

Pursuant to the FEC Regulations Sec. 111.2 we are filing a complaint regarding a committee in Minnesota apparently named "Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee", hereafter referred to as "Just a Bunch". This complaint is being filed by Ned Crosby on behalf of Minnesotans for Honesty in Politics, P.O. Box 9653, Minneapolis, Minnesota 55440 (telephone: 612-336-2002).

We allege the following violations by "Just a Bunch":

1. Although formed on or before October 26, 1978, they have not filed their Statement of Organization as of November 9, 1978, thus failing to meet the 10-day requirement set out in Sec. 102.1.
2. Although they have made at least three (and probably ten to twenty) expenditures of over \$1,000 after the 15th day, but more than 24 hours, before the November 7, 1978 election, no report of such expenditures pursuant to Sec. 109.2(c) has been made, to the best of our knowledge.
3. It is likely that they received contributions of \$1,000 or more after the 15th day, but more than 48 hours, before the November 7, 1978 election, yet no report of such contribution pursuant to Sec. 104.4(e) has been made, to the best of our knowledge.

Discussion

Although many "unauthorized committees" are sloppy in their filing, we feel it is important to move rapidly to get "Just a Bunch" to file properly. According to an interview done by KSJN radio on October 31, 1978 with D. D. Wozniak (Chairman of "Just a Bunch"), the group was formed on the morning of October 26, 1978. Yet the Minneapolis Tribune advertising office reports that by 5:00 P.M. that same day, "Just a Bunch" had deposited at least \$2,700 for an ad which appeared in the Tribune on October 29, 1978 (copy of ad enclosed).

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Our doubts are made more severe by an article by Gary Dawson in the St. Paul Pioneer Press, October 26, 1978 (copy enclosed). In this article Dawson reports that "a group of his self-proclaimed 'common sense' Democrats raised more than \$40,000" for Short at a fundraiser on October 25, 1978. Since the word "common sense" appears in the name "Just a Bunch" (Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee) we are quite suspicious that funds may have been transferred (legally or illegally) from the Short Campaign to the "Just a Bunch" committee. This suspicion is furthered because Wozniak referred to Peter Popovich as one of the founders of "Just a Bunch" and Popovich is listed in the Dawson article as one of the sponsors of the fundraiser.

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If "Just a Bunch" claims that most of their contributions do not need to be reported because they were \$100 or less, then this would lend even further weight to the suspicions of the preceding paragraph. If their money did not come from this source, then we believe it must have come in gifts of over \$1,000, since we are unaware of any other fundraising event. In this case they are in violation of point #3 above.

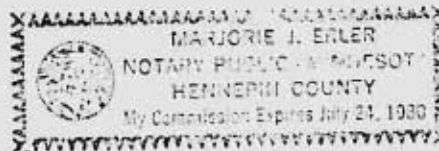
Conclusion

We urge you to move rapidly to insure the proper filing by "Just a Bunch". This is necessary if we are to be able to file a further complaint regarding our suspicions as spelled out in the discussion. This complaint is not being filed on behalf of, or at the request or suggestion of, any candidate.

Very truly yours,

Ned Crosby
Ned Crosby

Subscribed and sworn to before me this 13th day of Nov., 1978.



Margaret J. Erle

83040111278

same booth. "I don't want to be young. I wanna be happy..."

wants to sing everybody's blues away. — Photo for Los Angeles Times by Stephanie Maze

Fund-raiser long on cash for Short

By GARY DAWSON
Staff Writer

DFL U.S. Senate candidate Bob Short received a badly needed financial shot in the arm Wednesday night when a group of his self-proclaimed "common sense" Democrats raised more than \$40,000 at a \$100-a-head fund-raiser at the Town and Country Club in St. Paul.

St. Paul attorney Peter Popovich, one sponsor, estimated organizers sold a minimum of 410 tickets and should have at least \$41,000 additional money to pump into media advertising during the last two weeks of Short's campaign against Independent-Republican Dave Durenberger.

About 200 persons showed up including state DFL party chairman Rick Scott, who wore a "Short" campaign sticker.

When asked if his appearance and wearing of the sticker ran counter to his party's executive committee refusal to support Short, Scott said he didn't think so.

Among those attending were political independents, labor leaders, a smattering of Republicans, and a large number of DFLers who have been associated with Short for several years or who supported him in his successful DFL primary campaign against party-endorsed Don Fraser.

Short has spent more than \$1 million in the campaign thus far. But most of that was in the primary campaign that ended with his Sept. 12 victory. His campaign coffers, he said, have been strained because of the inflationary cost of doing political business these days.

"If I wasn't prepared to put my money where my mouth is, I shouldn't open it... but you can't believe what these newspapers charge for a little ad," he told supporters as he thanked them for their generosity.

Attorney General Warren Spannaus and a handful of state legislators also were on hand.

2 are convicted of bank robbery

The fund-raiser came at a time when Durenberger is putting on his own push for victory — equaling Short's television buying in the Twin Cities and exceeding it in one large outstate area served by Alexandria.

Short promised if elected to wipe out "fraud, waste and mismanagement" in federal government — a pledge that sets well with his many business backers.

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The Minneapolis Star and Tribune, which have opposed him editorially, also came in for criticism from the candidate.

"I did win in the areas where they don't deliver the Minneapolis Tribune and Minneapolis Star, so if you don't read those papers for the next two weeks, we'll be all right," Short said.

After his speech Short had more words for the Star which editorially endorsed Durenberger on the front page.

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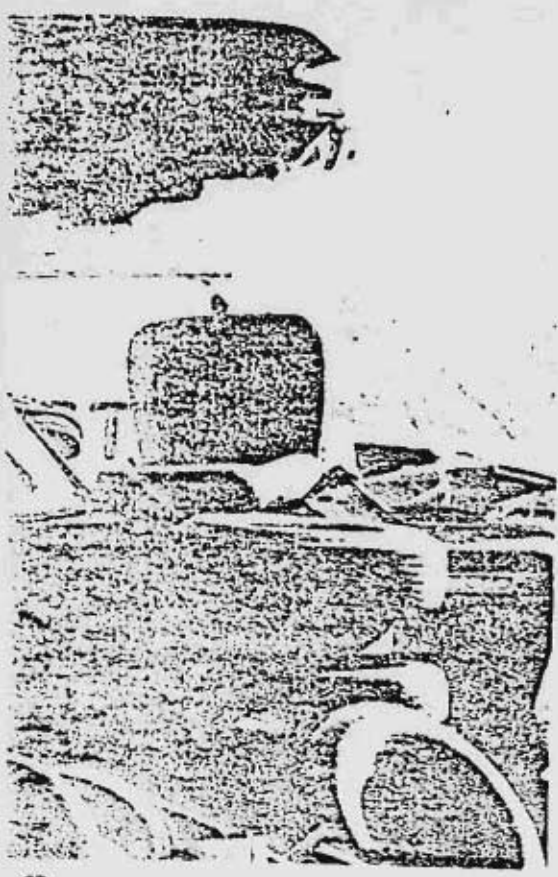
Short called the event the "most significant" fund-raiser in a campaign that has been financed almost solely out of his own pocket.

Earlier in the day, speaking before a group of realtors at the Lost Spur Country Club, he reiterated his view that inflation is the most serious threat to the nation.

Also Wednesday, Short outlined a five-point plan to enforce spending cuts, including tougher anti-fraud laws and blue ribbon investigating committees to oversee federal spending.

Meanwhile, the 5th Congressional District DFL in Minneapolis, which met Tuesday night, reaffirmed its anti-Short stance by passing a resolution urging the defeat of Short.

2 businesses



What they called a junkyard in bygone days street, just waiting for someone who needs it. Photo by Spence Hollstadt

loud killings

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drawing them. Police have theorized the murderer was someone they knew.

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Mr. X said he became suspicious of the man after learning the suspect killed himself shortly after the Rekens were murdered.

Investigators for the sheriff's office have refused to comment on the case. The St. Cloud Times, however, found out that a patient matching the description given by Mr. X did kill himself eleven days after the Rekens were murdered.

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St Paul Pioneer Press

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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.

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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 Folks Who Want Common Sense Government Committee, D. D. Wozniak, Chairman, 401 Midwest Federal Bldg., St. Paul 55101. No candidates have authorized this ad.





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald Wozniak, Chairman
Just a Bunch of Plain DFL Folks
Who Want Common Sense Government
Committee
401 Midwest Federal Building
St. Paul, Minnesota 55101

Re: MUR 853 (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 853 (78). A copy of the complaint is enclosed. On December , 1978, the Commission found reason to believe that the matters alleged therein state violations of 2 U.S.C. §433, §434, and 11 CFR 109.2(c). On that same date, the Commission determined that there is no reason to believe the committee has violated 11 CFR 104.4(e).

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 state whether you or the Just a Bunch Committee sponsored, or were in any way connected with the fundraiser held on October 25, 1978, at the Town and Country Club in St. Paul to which the enclosed article refers.

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 at 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

3304041123



FEDERAL ELECTION COMMISSION

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

November 16, 1978

Ned Crosby
Minnesotans for Honesty in
Politics
P.O. Box 9653
Minneapolis, Minnesota 55440

Dear Mr. Crosby:

This is to acknowledge receipt of your complaint of November 13, 1978 alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations and 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 procedures for handling complaints.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lester N. Scall", is written over the typed name.

Lester N. Scall
Assistant General
Counsel

Enclosure

3304041123

MINNESOTANS FOR HONESTY IN POLITICS
P.O. Box 9653
Minneapolis, Minnesota 55440

853 ACC 5600
MUR
November 13, 1978

Federal Elections Commission
1325 K Street, Northwest
Washington, D.C. 20463

807829 NOV 15 AM 11:56

Dear Sirs:

Pursuant to the FEC Regulations Sec. 111.2 we are filing a complaint regarding a committee in Minnesota apparently named "Just a Bunch of Plain DFL Folks Who Want Common Sense Government Committee", hereafter referred to as "Just a Bunch". This complaint is being filed by Ned Crosby on behalf of Minnesotans for Honesty in Politics, P.O. Box 9653, Minneapolis, Minnesota 55440 (telephone: 612-336-2002).

We allege the following violations by "Just a Bunch":

1. Although formed on or before October 26, 1978, they have not filed their Statement of Organization as of November 9, 1978, thus failing to meet the 10-day requirement set out in Sec. 102.1.
2. Although they have made at least three (and probably ten to twenty) expenditures of over \$1,000 after the 15th day, but more than 24 hours, before the November 7, 1978 election, no report of such expenditures pursuant to Sec. 109.2(c) has been made, to the best of our knowledge.
3. It is likely that they received contributions of \$1,000 or more after the 15th day, but more than 48 hours, before the November 7, 1978 election, yet no report of such contribution pursuant to Sec. 104.4(e) has been made, to the best of our knowledge.

Discussion

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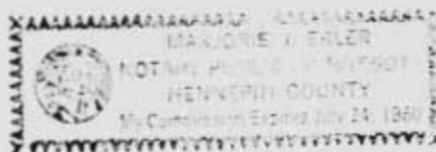
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Very truly yours,

Ned Crosby
Ned Crosby

Subscribed and sworn to before me this 13th day of Nov., 1978.



Marjorie J. Erler

33040411202

Fund-raiser long on cash for Short

By GARY DAWSON
Staff Writer

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**2 are convicted
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what they called a junkyard in bygone days
Street, just waiting for someone who needs
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St Paul Pioneer Press

10-26-78 p 28

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EPA accused of hiding data on nat

By John Holusha
Washington Star

Washington, D.C.

The Environmental Protection Agency has been accused of suppressing a scientific study showing that as much as 80 percent of air pollution comes not from cars and smokestacks, but plants and trees.

According to a freedom-of-information suit filed to pry out the report, EPA officials told the author the agency's "original intention was to prevent the publication of an EPA report on natural hydrocarbon emissions that possibly would confuse hydrocarbon control strategy."

The EPA officials said, "We recognized the possible problem of misinterpretation that could occur" if the

report were published.

EPA has replied that the study will be published when it is finished, possibly "in the next few weeks," according to spokesman Marlin Fitzwater. He said the letter saying the report would be suppressed was the work of "misguided employees."

The key scientist involved, Patrick R. Zimmerman of Washington State University, made the estimate that 80 percent of air pollution in the United States comes from natural sources after a detailed study of the Tampa-St. Petersburg, Fla., region.

In that relatively urban area, Zimmerman found that 68 percent of ozone causing substances came from vegetation and leaf litter, with only 32 percent from man-made sources.

The report was cited by the American Petroleum Institute (API), which is opposing EPA's proposed ozone standards. It was the API, the trade association for the oil companies, that filed the freedom-of-information suit last month.

In explaining to Zimmerman why his report would be kept under wraps, EPA scientists Joseph J. Bufalini and William A. Lonneman wrote:

"We recognized a possible problem of misinterpretation that could occur if the hydrocarbon emissions of the Tampa-St. Petersburg area are presented as 68 percent natural and 32 percent anthropogenic. For example, an unwitting person might interpret a downtown 6 a.m.-9 a.m. total hydrocarbon concentration of 5.0 (parts per million) as 3.4 ppm natu-

ral and 1.6 ppm anthropo-

"This has been done in several state and local control agencies to confuse oxidant control strategies. This is a serious problem."

The EPA confirmed the content of the letter.

EPA has proposed slight ozone standard, but groups, including API, find it unattainable. In a lawsuit filed with the agency "based on evidence regarding emissions it is becoming increasingly obvious that natural causes can contribute to levels in excess of the standards in many areas, including attainment."

Fire-station money raised from citizen

By John Karras
Des Moines Register

Laurens, Iowa

Just about everyone agreed that Laurens needed a new fire station, but more than a few eyebrows went up at the proposed method for financing it — donations.

That's right, the fire station backers proposed to raise \$88,953.17 by knocking on the doors of the 685 families in the Laurens fire district. That works out to an average donation of \$129.86 per family.

And what do you know? The fund drive started in late August and contributions now stand at a little more than \$80,000. Fund drive organizers are confident the rest will come in.

The new building will be put up this fall and should be ready for occupancy by next spring. Fire equipment now is housed in three buildings — the fire station, a former service station and at the Hansen & Hansen lumber yard. The present fire station is, by common agreement, the poorest facility the city owns.

The funny thing is that hardly anyone thought a fund drive would work. Several people argued that a bond issue would be more equitable because all property owners would have to pay a fair share. They noted that Laurens has a history of approving bond issues.

But the fund-drive advocates, with the specter of Proposition 13 and talk of tax revolt looming large, were



interest figure came from the county auditor. The main pitch to contributors was that they were being asked to prepay taxes at a much lower rate.

Benz and Hersom agree that the most difficult part of the project was figuring out how to go about it. They spent hours discussing tactics.

"You can't go around and raise \$90,000 with \$25 donations," Benz said. So about 60 canvassers were brought together, part to solicit in town, part in the country. The Laurens Jaycees picked up much of the canvassing burden. Other groups held special fund-raising events for the drive.

But the first step was to see the prospective big givers. "The real key is to see the people first who'll set the pace," Benz said. "We contacted our major industries. I think with the

first five or six we contacted \$20,000."

Then it was out knocking. "We had to go in and sell," said Hersom, whose company built the station. "Each of a half to 1½ hours."

One farmer sent a check, another a check for \$614.50 set aside a load of corn for the fund drive," Benz said. "Why we got the odd dollar

"One farmer came in with a load and told me how the fire station tried to save his boy seven years ago. He said he was paid back."

They're MA

As you read the rantings of metropolitan press, and listen to the brokers, you get the impression that

MINNESOTANS FOR HONESTY IN POLITICS
P.O. Box 9653
Minneapolis, MN 55440



NOV 15 AM 8:56
Federal Elections Commission
1325 K Street, Northwest
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 812, 818, 853

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

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