



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 3606

DATE FILMED 10/28/93 CAMERA NO. 2

CAMERAMAN MC

93040990949

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 9 9 00 AM '92

September 1, 1992

MUR 3606

General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Complaint against K.B. McGinnis and
Allegiance of Republican Americans,
Respondents

Dear Sir or Madam:

This notarized complaint is filed pursuant to 11 CFR 111.4.

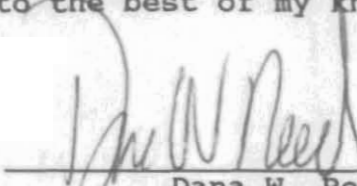
Complainant is informed and believes and upon such information and belief alleges that on or about August 21, 1992, respondents K.B. McGinnis and Allegiance of Republican Americans caused to be mailed, communications soliciting funds for use in re-electing President George Bush and electing Republicans to seats in both the United States House of Representatives and the United States Senate.

An original of said mailer including the transmittal envelope is enclosed herewith.

Respondents, and each of them, failed to disclose in said communication whether or not their solicitation was authorized by President Bush and/or any other candidate or candidates all in violation of 11 CFR 110.11.

Complainant is informed and believes and upon such information and belief alleges that respondent Allegiance of Republican Americans is a political committee as defined in 11 CFR 100.5(a) but has failed to file a Statement of Organization in violation of 11 CFR 102.1(d).

I declare under penalty of perjury that the above statement is true and correct to the best of my knowledge.



Dana W. Reed
3151 Airway Avenue, Suite M-1
Costa Mesa, CA 92626

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 2 DAY OF Sept 19 92

Candy A. Trueblood

NOTARY PUBLIC



92 SEP -9 PM 3:44

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
COUNSEL

0560604069



Allegiance of Republican Americans

1929 18th Street, N.W. Suite #1202
Washington, D.C. 20009

Dear Fellow Republican:

This election year is proving to be one of the most exciting and yet challenging campaign seasons in our history.

Not only do we have the opportunity to re-elect President Bush to a second term, thereby an unprecedented sixteen straight years of Republican Administration, but coast to coast we have the chance to elect Republicans to seats in both the House of Representatives and the Senate!

With President George Bush and a Republican Majority in Congress there would be no limit to the goals we could achieve.

From the National Endowment for the Arts and The Supreme Court to our objectives for a New World Order, no goal is unattainable - no challenge too great.

But it all begins with YOU. We need to work together to attain these goals.

Please help by contributing what you can to assure success in November. Your generous contribution of \$500, \$250, \$100, \$50, or \$25 is crucial to victory in '92.

The future holds some exciting possibilities. Please, take a moment right now to write out a check towards that goal. With your help the future is ours.

Sincerely,

K.B. McGinnis
Director

P.S. Time is quickly running out for purchasing media spots in many of the major markets. Please take a moment right now and make as generous a contribution as you can.

Enclosed is my generous contribution of:

____ \$500 ____ \$250
____ \$100 ____ \$50
____ \$25 ____ (OTHER)

Make check payable to Allegiance of Republican Americans.

Mail to:

MR DARRYL WOLD
112 1/2 PEARL
BALBOA ISLAND

CA 92662



**Allegiance of
Republican Americans**

1929 18th Street, N.W. Suite #1202
Washington, D.C. 20009

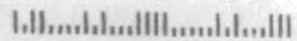
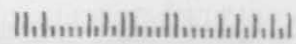
SANTA ANA



0032 082452



3040990952





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1992

Ms. Dana W. Reed
3151 Airway Avenue, Suite M-1
Costa Mesa, California 92626

RE: MUR 3606

Dear Ms. Reed:

This letter acknowledges receipt on September 9, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the Allegiance of Republican Americans and K.B. McGinnis, as Director. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3606. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

93040990953



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1992

Allegiance of Republican Americans
1929 18th Street, NW Suite #1202
Washington, DC 20009

RE: MUR 3606

Dear Mr. McGinnis:

The Federal Election Commission received a complaint which indicates that the Allegiance of Republican Americans may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3606. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Allegiance of Republican Americans in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040990954

Allegiance of Republican Americans
Page 2

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040990955



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1992

Mr. K.B. McGinnis, Director
Allegiance of Republican Americans
1929 18th Street, NW Suite #1202
Washington, DC 20009

RE: MUR 3606

Dear Mr. McGinnis:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3606. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040990956

Mr. K.B. McGinnis, Director
Allegiance of Republican Americans
Page 2

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040990957



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Allegiance of Republican Americans
1929 18th Street, N.W. Suite #1202
Washington, D.C. 20009

RE: MUR 3606

Dear Mr. McGinnis:

On September 14, 1992, you were notified that the Federal Election Commission received a complaint which indicates that the Allegiance of Republican Americans may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). Enclosed are copies of the materials that were sent to the Allegiance of Republican Americans at that time. Under the Act and Commission regulations, you have an opportunity to demonstrate that no action should be taken against the Allegiance of Republican Americans.

A review of our files indicates that to date the Allegiance of Republican Americans has not responded to the complaint in this matter. Because the time period in which the response should have been submitted has already elapsed, such response should be submitted as soon as possible.

Should you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

Letter (dated September 14, 1992)
with enclosures

93040990958



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K. B. McGinnis, Director
Allegiance of Republican Americans
1929 18th Street, N.W. Suite #1202
Washington, D.C. 20009

RE: MUR 3606

Dear Mr. McGinnis:

On September 14, 1992, you were notified that the Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). Enclosed are copies of the materials that were sent to you at that time. Under the Act and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the complaint in this matter. Because the time period in which the response should have been submitted has already elapsed, you should submit a response as soon as possible.

Should you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

Letter (dated September 14, 1992)
with enclosures

93040990959

MUR # 3606

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY
BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM
LOCATIONS.

93040990960



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MJR # 3606

DATE FILMED 10/28/93 CAMERA NO. 2

CAMERAMAN MC

93040990961



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

☒ Microfilm
☐ Public Records
☐ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3606.

12/10/93

93043543183

9 3 0 4 3 5 4 3 1 8 4

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report.
See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System.
See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993.
See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993.
See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993.
See Reel 354, pages 1741-1746.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 10 1993

Dana W. Reed
3151 Airway Avenue
Suite M-1
Costa Mesa, CA 92626

RE: MUR 3606

Dear Ms. Reed:

On September 9, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Allegiance of Republican Americans and R.B. McGinnis, as Director. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary Ann Bumgarner

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

93043543185

MUR 3606

Allegiance of Republican Americans

This matter was generated by a complaint from Dana W. Reed alleging that the Allegiance of Republican Americans circulated a mailer soliciting funds for George Bush that did not have the appropriate disclaimer. Complainant also alleges that respondents have failed to file a Statement of Organization with the Commission. The amount of distribution of the mailer is unknown. Respondents did not respond to the complaint and the time period for response has expired.

This matter reflects no indication of serious intent by respondents to violate the FECA, involves no significant issue relative to the other issues pending before the Commission, involves no substantial amounts of money, and involves inexperienced actors.

9 3 0 4 3 5 4 3 1 8 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

K.B. McGinnis, Director
Allegiance of Republican
Americans
1929 18th Street NW, Suite 1202
Washington, DC 20009

RE: MUR 3606

Dear Mr. McGinnis:

On September 14, 1992, the Federal Election Commission notified the Allegiance of Republican Americans and you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Allegiance of Republican Americans and you. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Ann Bumgarner
Mary Ann Bumgarner

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

93043543187

MUR 3606

Allegiance of Republican Americans

This matter was generated by a complaint from Dana W. Reed alleging that the Allegiance of Republican Americans circulated a mailer soliciting funds for George Bush that did not have the appropriate disclaimer. Complainant also alleges that respondents have failed to file a Statement of Organization with the Commission. The amount of distribution of the mailer is unknown. Respondents did not respond to the complaint and the time period for response has expired.

This matter reflects no indication of serious intent by respondents to violate the FECA, involves no significant issue relative to the other issues pending before the Commission, involves no substantial amounts of money, and involves inexperienced actors.

93043543188.